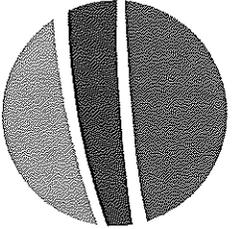


RECEIVED  
DEC 20 2017  
AIR QUALITY DIVISION

**Mercury and Air Toxics  
Standard Particulate  
Matter and Hydrogen  
Chloride Emissions  
Test Report**

---

We Energies  
Presque Isle Power Plant  
Flue 5 Stack  
Marquette, Michigan  
Project No. M174801A  
November 7, 2017

**mostardi**  **platt**



**Mercury and Air Toxics Standard Particulate Matter and  
Hydrogen Chloride Emissions Test Report**

**We Energies  
Presque Isle Power Plant  
Flue 5 Stack  
Marquette, Michigan  
November 7, 2017**

**Report Submittal Date  
December 8, 2017**

© Copyright 2017  
All rights reserved in  
Mostardi Platt

**Project No. M174801A**

## 1.0 EXECUTIVE SUMMARY

MOSTARDI PLATT conducted a Mercury and Air Toxics Standards (MATS) filterable particulate matter and hydrogen chloride emissions test program for the We Energies at the Presque Isle Power Plant on the Flue 5 Stack in Marquette, Michigan on November 7, 2017. This report summarizes the results of the test program and test methods used.

The test location, test date, and test parameters are summarized below.

TEST INFORMATION		
Test Location	Test Date	Test Parameters
Flue 5 Stack	November 7, 2017	Filterable Particulate Matter (FPM) and Hydrogen Chloride (HCl)

The purpose of the test program was to document FPM and HCl emissions to qualify for the LEE designation as required by 40 CFR Part 63, Subpart UUUUU. Selected results of the test program are summarized below. A complete summary of emission test results follows the narrative portion of this report.

TEST RESULTS			
Test Location	Test Parameter	Emission Limits	Emission Rates
Flue 5 Stack	FPM	≤0.030 lb/mmBtu	0.0009 lb/mmBtu
	HCl	≤0.002 lb/mmBtu	0.0002 lb/mmBtu

Emissions on lb/mmBtu basis were determined using a standard  $F_d$ -Factor of 9,820 dscf/mmBtu for sub-bituminous coal. Plant operating data as provided by We Energies is included in Appendix A.

One of the test ports was obstructed and Mostardi Platt sampled at two ports, six points each instead of the four ports, three points as outlined in the test protocol. Mostardi Platt does not believe that this impacted the data that was collected.

The Stationary Source Audit Sample Program audit sample was obtained from ERA and analyzed by Mostardi Platt. The results of the audit sample were compared to the assigned value by ERA and found to be acceptable. The audit sample result and evaluation are appended to this report.

The identifications of the individuals associated with the test program are summarized below.

TEST PERSONNEL INFORMATION		
Location	Address	Contact
Test Coordinator	We Energies 333 West Everett Street Environmental Department A231 Milwaukee, Wisconsin 53203	Mr. Rob Bregger (414) 221-2772 (phone) rob.bregger@we-energies.com
Test Facility	We Energies Presque Isle Power Plant 2701 Lakeshore Boulevard, North Marquette, Michigan 49885	Ms. Cindy Brandt, P.E. (920) 433-1830 (phone) chbrandt@integrysgroup.com
Testing Company Representative	Mostardi Platt 888 Industrial Drive Elmhurst, Illinois 60126	Mr. Stuart Sands Project Manager (630) 993-2100 (phone) ssands@mp-mail.com

The test crew consisted of Messrs. C. Menet, E. Charatz, J. Rogers, T. Schmidt, and S. Sands of Mostardi Platt.

## 2.0 TEST METHODOLOGY

Emissions testing was conducted following the methods specified in 40CFR60, Appendix A. A schematic of the test section diagram is found in Appendix B and schematics of the sampling trains used are included in Appendix C. Calculation nomenclature and sample calculations are included in Appendix D. Laboratory analysis data are found in Appendix E. Copies of analyzer print-outs for each test run are included in Appendix F and field data sheets are found in Appendix G.

The following methodologies were used during the test program:

### Method 1 Traverse Point Determination

Test measurement points were selected in accordance with Method 1. The characteristics of the measurement location are summarized below.

TEST POINT INFORMATION				
Location	Upstream Diameters	Downstream Diameters	Test Parameter	Number of Sampling Points
Flue 5 Stack	>2.0	>8.0	FPM, HCl	12

### Method 2 Volumetric Flowrate Determination

Gas velocity was measured following Method 2, for purposes of calculating stack gas volumetric flow rate. An S-type pitot tube, differential pressure gauge, thermocouple and temperature readout were used to determine gas velocity at each sample point. All of the equipment used was calibrated in accordance with the specifications of the Method. Calibration data are presented in Appendix H.

### **Method 3A Oxygen (O<sub>2</sub>)/Carbon Dioxide (CO<sub>2</sub>) Determination**

Stack gas molecular weight was determined in accordance with Method 3A. An ECOM analyzer was used to determine stack gas oxygen and carbon dioxide content and, by difference, nitrogen content. All of the equipment used was calibrated in accordance with the specifications of the Method. Calibration data are presented in Appendix H and copies of the gas cylinder certifications are found in Appendix I.

### **Method 5 Filterable Particulate Matter (FPM) Determination**

Stack gas filterable particulate concentrations and emission rates were determined in accordance with Method 5 with filter and probe temperatures between 248 and 273 degrees Fahrenheit in accordance with the USEPA letter which is appended. An Environmental Supply Company, Inc. sampling train was used to sample stack gas at an isokinetic rate, as specified in the Method utilizing Pallflex TX40HI45 filters. Particulate matter in the sample probe was recovered using an acetone wash. The probe wash and filter catch were analyzed by Mostardi Platt personnel. Laboratory analysis data are found in Appendix E. Calibration data are presented in Appendix H.

### **Method 26A Hydrogen Chloride (HCl) Determination**

Stack gas HCl concentrations and emission rates were determined in accordance with Method 26A, 40CFR60, Appendix A in conjunction with the USEPA Method 5 sampling. An Environmental Supply Company sampling train was used to sample stack gas, in the manner specified in the Method utilizing Pallflex TX40HI45 filters. Analyses of the samples collected were conducted by Mostardi Platt in the Elmhurst laboratory. Sample analysis data are found in Appendix E. All of the equipment used was calibrated in accordance with the specifications of the Method. Calibration data are presented in Appendix H.

RECEIVED

DEC 20 2017

3.0 TEST RESULT SUMMARIES

AIR QUALITY DIVISION

Client: We Energies  
 Facility: Presque Isle Power Plant  
 Test Location: Flue 5  
 Test Method: 5/26A

	Source Condition	Normal	Normal	Normal	
	Date	11/7/17	11/7/17	11/7/17	
	Start Time	7:25	10:00	12:30	
	End Time	9:30	12:05	14:35	
		Run 1	Run 2	Run 3	Average
<b>Stack Conditions</b>					
Average Gas Temperature, °F		327.0	330.0	330.0	329.0
Flue Gas Moisture, percent by volume		11.0%	10.5%	11.3%	10.9%
Average Flue Pressure, in. Hg		29.24	29.24	29.24	29.24
Gas Sample Volume, dscf		107.616	107.702	100.996	105.438
Average Gas Velocity, ft/sec		74.354	74.452	74.569	74.458
Gas Volumetric Flow Rate, acfm		283,812	284,187	284,634	284,211
Gas Volumetric Flow Rate, dscfm		165,620	166,128	164,903	165,550
Gas Volumetric Flow Rate, scfm		186,090	185,618	185,910	185,873
Average %CO <sub>2</sub> by volume, dry basis		13.6	13.4	13.3	13.4
Average %O <sub>2</sub> by volume, dry basis		5.7	6.0	6.1	5.9
Isokinetic Variance		107.9	107.7	101.7	105.8
Standard Fuel Factor Fd, dscf/mmBtu		9,820.0	9,820.0	9,820.0	9,820.0
<b>Filterable Particulate Matter (Method 5)</b>					
grams collected		0.00264	0.00270	0.00368	0.00301
mg/dscm		0.866	0.885	1.287	1.0128
grains/acf		0.0002	0.0002	0.0003	0.0002
grains/dscf		0.0004	0.0004	0.0006	0.0005
lb/hr		0.537	0.551	0.795	0.628
lb/mmBtu (Standard Fd Factor)		0.0007	0.0008	0.0011	0.0009

Client: We Energies  
 Facility: Presque Isle Power Plant  
 Test Location: Flue 5  
 Test Method: 5/26A

	Source Condition	Normal	Normal	Normal	
	Date	11/7/17	11/7/17	11/7/17	
	Start Time	7:25	10:00	12:30	
	End Time	9:30	12:05	14:35	
	Run 1	Run 2	Run 3	Average	
<b>Stack Conditions</b>					
Average Gas Temperature, °F		327.0	330.0	330.0	329.0
Flue Gas Moisture, percent by volume		11.0%	10.5%	11.3%	10.9%
Average Flue Pressure, in. Hg		29.24	29.24	29.24	29.24
Gas Sample Volume, dscf		107.616	107.702	100.996	105.438
Average Gas Velocity, ft/sec		74.354	74.452	74.569	74.458
Gas Volumetric Flow Rate, acfm		283,812	284,187	284,634	284,211
Gas Volumetric Flow Rate, dscfm		165,620	166,128	164,903	165,550
Gas Volumetric Flow Rate, scfm		186,090	185,618	185,910	185,873
Average %CO <sub>2</sub> by volume, dry basis		13.6	13.4	13.3	13.4
Average %O <sub>2</sub> by volume, dry basis		5.7	6.0	6.1	5.9
Isokinetic Variance		107.9	107.7	101.7	105.8
Standard Fuel Factor Fd, dscf/mmBtu		9,820.0	9,820.0	9,820.0	9,820.0
<b>Hydrogen Chloride (HCl) Emissions</b>					
ug of sample collected		595.98	569.65	509.09	558.24
ppm		0.13	0.12	0.12	0.12
mg/dscm		0.20	0.19	0.18	0.19
lb/hr		0.121	0.116	0.110	0.116
lb/mmBtu (Standard Fd Factor)		0.0002	0.0002	0.0002	0.0002

## 4.0 CERTIFICATION

MOSTARDI PLATT is pleased to have been of service to We Energies. If you have any questions regarding this test report, please do not hesitate to contact us at 630-993-2100.

### CERTIFICATION

As project manager, I hereby certify that this test report represents a true and accurate summary of emissions test results and the methodologies employed to obtain those results, and the test program was performed in accordance with the methods specified in this test report.

MOSTARDI PLATT



---

Stuart Sands

Program Manager



---

Scott W. Banach

Quality Assurance