



**AIR EMISSION TEST REPORT**

Title AIR EMISSION TEST REPORT FOR THE LANDFILL  
 GAS FUELED INTERNAL COMBUSTION ENGINE  
 OPERATED AT THE SOUTH KENT LANDFILL  
 FACILITY

Report Date February 2, 2016

Test Dates January 7, 2016

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Facility Information	
Name	Granger Electric at the South Kent Landfill
Street Address	10300 South Kent Drive SW
City, County	Byron Center, Kent

Facility Permit Information	
ROP No.:	MI-ROP-N1324-2012
Facility SRN :	N1324

Testing Contractor	
Company	Derenzo Environmental Services
Mailing Address	39395 Schoolcraft Road Livonia, MI 48150
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Project No.	1508005

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AIR EMISSION TEST REPORT  
FOR THE  
VERIFICATION OF AIR POLLUTANT EMISSIONS  
FROM  
LANDFILL GAS FUELED INTERNAL COMBUSTION ENGINES  
GRANGER ELECTRIC AT THE SOUTH KENT LANDFILL

**1.0 INTRODUCTION**

Granger Electric (Granger) operates two (2) Caterpillar (CAT®) Model No. G3520C gas fueled internal combustion (IC) engines and electricity generator sets at the South Kent Landfill in Byron Center, Kent County, Michigan. The two (2) landfill gas (LFG) fueled IC engine-generator sets are identified as emission units EUICEENGINE1 and EUICEENGINE2 (collectively flexible emission group FGICEENGINES) in Section 2 of Michigan Renewable Operating Permit (ROP) No. MI-ROP-N1324-2012 issued by the Michigan Department of Environmental Quality (MDEQ).

The conditions of MI-ROP-N1324-2012:

1. Allow for the installation and operation of two (2) spark ignition, lean burn reciprocating internal combustion engine (RICE) and electricity generation sets (CAT® Model G3520C) that have a rated horsepower (hp) output of 2,233 at full load.
2. Specify that ... *Except as provided in 40 CFR 60.4243, the permittee shall conduct an initial performance test for each engine in FGENGINES within one year after startup of the engine and every 8760 hours of operation or three years, whichever occurs first, to demonstrate compliance unless the engines have been certified by the manufacturer as required by 40 CFR Part 60 Subpart JJJJ and the permittee maintains the engine as required by 40 CFR 60.4243(a)(1). If a performance test is required, the performance tests shall be conducted according to 40 CFR 60.4244.*

The compliance testing was performed by Derenzo Environmental Services, a Michigan-based environmental consulting and testing company. Derenzo Environmental Services representatives Jason Logan, Blake Beddow, and Clay Gaffey performed the field sampling and measurements January 7, 2016.

The exhaust gas sampling and analysis was performed using procedures specified in the Test Plan dated October 30, 2015 that was reviewed and approved by the Michigan Department of Environmental Quality (MDEQ). The MDEQ-AQD was notified of the test date. However, there was no MDEQ representative onsite to observe the testing project.

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**Report Certification**

This test report was prepared by Derenzo Environmental Services based on field sampling data collected by Derenzo Environmental Services. Facility process data were collected and provided by Granger employees or representatives. This test report has been reviewed by Granger representatives and approved for submittal to the MDEQ. A test report certification form (EQP 5736) is attached at the head of the report.

I certify that the testing was conducted in accordance with the specified test methods and submitted test plan unless otherwise specified in this report. I believe the information provided in this report and its attachments are true, accurate, and complete.

Report Prepared By:

Reviewed By:



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Jason Logan  
Environmental Consultant  
Derenzo Environmental Services



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Robert L. Harvey, P.E.  
General Manager  
Derenzo Environmental Services

## **2.0 SOURCE AND SAMPLING LOCATION DESCRIPTION**

### **2.1 General Process Description**

Landfill gas (LFG) containing methane is generated in the South Kent Landfill from the anaerobic decomposition of disposed waste materials. The LFG is collected from both active and capped landfill cells using a system of wells (gas collection system). The collected LFG is transferred to the Granger LFG power station facility where it is treated and used as fuel for the two (2) RICE. Each RICE is connected to an electricity generator that produces electricity that is transferred to the local utility.

### **2.2 Rated Capacities and Air Emission Controls**

The CAT® Model No. G3520C RICE has a rated output of 2,233 brake-horsepower (bhp) and the connected generator has a rated electricity output of 1,600 kilowatts (kW). The engine is designed to fire low-pressure, lean fuel mixtures (e.g., LFG) and is equipped with an air-to-fuel ratio controller that monitors engine performance parameters and automatically adjusts the air-to-fuel ratio and ignition timing to maintain efficient fuel combustion.

The RICE generator sets are not equipped with add-on emission control devices. Air pollutant emissions are minimized through the proper operation of the gas treatment system and efficient fuel combustion in the engines.

The fuel consumption rate is regulated automatically to maintain the heat input rate required to support engine operations and is dependent on the fuel heat value (methane content) of the treated LFG.

### **2.3 Sampling Locations**

The RICE exhaust gas is directed through mufflers and is released to the atmosphere through dedicated vertical exhaust stacks. The two (2) CAT® Model G3520C RICE exhaust stacks are identical.

The exhaust stack sampling ports for the CAT® Model G3520C engines (EUIECEENGINE1 – EUIECEENGINE2) are located in individual exhaust stacks with an inner diameter of 13.5 inches. Each stack is equipped with two (2) sample ports, opposed 90°, that provide a sampling location greater than 24.0 inches (1.71 duct diameters) upstream and greater than 168.0 inches (12.0 duct diameters) downstream from any flow disturbance and satisfies the USEPA Method 1 criteria for a representative sample location.

Individual traverse points were determined in accordance with USEPA Method 1.

Appendix 1 provides diagrams of the emission test sampling location.

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### **3.0 SUMMARY OF TEST RESULTS AND OPERATING CONDITIONS**

#### **3.1 Purpose and Objective of the Tests**

The conditions of ROP No. MI-ROP-N1324-2012 and 40 CFR Part 60 Subpart JJJJ require Granger to test each engine contained in FGENGINES for carbon monoxide (CO), nitrogen oxides (NO<sub>x</sub>) and volatile organic compounds (VOCs) every 8,760 hours of operation.

#### **3.2 Operating Conditions During the Compliance Tests**

The testing was performed while the Granger RICE generator sets were operated at maximum operating conditions (1,600 kW electricity output +/- 10%). Granger representatives provided the generator electricity output (kW) in 15-minute intervals for each test period. The generator kW output ranged between 1,500 and 1,575 kW during the test periods.

Fuel flowrate (pounds per hour) and fuel methane content (%), were also recorded by Granger representatives at 15-minute intervals for each test period. The FGENGINES fuel consumption rate ranged between 2,200 and 2,269 lb/hr and fuel methane content ranged between 52.9 and 53.2%

In addition, the engine serial number and operating hours at the beginning of test No. 1 were recorded by the facility operators.

Appendix 2 provides operating records provided by Granger representatives for the test periods.

Engine output (bhp) cannot be measured directly and was calculated based on the recorded electricity output, the calculated CAT® Model G3520C generator efficiency (96.1%), and the unit conversion factor for kW to horsepower (0.7457 kW/hp).

$$\text{Engine output (bhp)} = \text{Electricity output (kW)} / (0.961) / (0.7457 \text{ kW/hp})$$

Table 3.1 presents a summary of the average engine operating conditions during the test periods.

#### **3.3 Summary of Air Pollutant Sampling Results**

The gases exhausted from the LFG fueled RICE (EUICEENGINE1 and EUICEENGINE2) were each sampled for three (3) one-hour test periods during the compliance testing performed January 7, 2016.

Table 3.2 presents the average measured CO, NO<sub>x</sub> and VOC emission rates for the engines (average of the three test periods for each engine).

Test results for each one hour sampling period are presented in Section 6.0 of this report.

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Table 3.1 Average engine operating conditions during the test periods

Engine Parameter	EUICEENGINE1	EUICEENGINE2
Generator output (kW)	1,552	1,558
Engine output (bhp)	2,165	2,174
Engine LFG fuel use (lb/hr)	2,215	2,251
LFG methane content (%)	53.1	53.0
Exhaust temperature (°F)	833	775

Table 3.2 Average measured emission rates for each engine (three-test average)

Emission Unit	CO Emission Rates		NOx Emission Rates		VOC Emission Rates	
	(lb/hr)	(g/bhp-hr)	(lb/hr)	(g/bhp-hr)	(lb/hr)	(g/bhp-hr)
Engine No. 1	9.2	1.93	1.84	0.39	0.46	0.10
Engine No. 2	12.6	2.63	2.52	0.53	0.74	0.15
Permit Limit	16.23	3.3	4.92	1.0	--	1.0

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#### 4.0 SAMPLING AND ANALYTICAL PROCEDURES

A test protocol for the air emission testing was reviewed and approved by the MDEQ. This section provides a summary of the sampling and analytical procedures that were used during the testing periods.

##### 4.1 Summary of Sampling Methods

USEPA Method 1	Exhaust gas velocity measurement locations were determined based on the physical stack arrangement and requirements in USEPA Method 1
USEPA Method 2	Exhaust gas velocity pressure was determined using a Type-S Pitot tube connected to a red oil incline manometer; temperature was measured using a K-type thermocouple connected to the Pitot tube.
USEPA Method 3A	Exhaust gas O <sub>2</sub> and CO <sub>2</sub> content was determined using zirconia ion/paramagnetic and infrared instrumental analyzers, respectively.
USEPA Method 4	Exhaust gas moisture was determined based on the water weight gain in chilled impingers.
USEPA Method 7E	Exhaust gas NO <sub>x</sub> concentration was determined using chemiluminescence instrumental analyzers.
USEPA Method 10	Exhaust gas CO concentration was measured using an NDIR instrumental analyzer
USEPA Method 25A / ALT-096	Exhaust gas VOC (as NMHC) concentration was determined using a flame ionization analyzer equipped with methane separation column

##### 4.2 Exhaust Gas Velocity Determination (USEPA Method 2)

The RICE exhaust stack gas velocities and volumetric flow rates were determined using USEPA Method 2 prior to and after each test. An S-type Pitot tube connected to a red-oil manometer was used to determine velocity pressure at each traverse point across the stack cross section. Gas temperature was measured using a K-type thermocouple mounted to the Pitot tube. The Pitot tube and connective tubing were leak-checked periodically to verify the integrity of the measurement system.

The absence of significant cyclonic flow for the exhaust configuration was verified using an S-type Pitot tube and oil manometer. The Pitot tube was positioned at each velocity traverse point with the planes of the face openings of the Pitot tube perpendicular to the stack cross-sectional

plane. The Pitot tube was then rotated to determine the null angle (rotational angle as measured from the perpendicular, or reference, position at which the differential pressure is equal to zero). Appendix 3 provides exhaust gas flowrate calculations and field data sheets.

#### **4.3 Exhaust Gas Molecular Weight Determination (USEPA Method 3A)**

CO<sub>2</sub> and O<sub>2</sub> content in the RICE exhaust gas stream was measured continuously throughout each test period in accordance with USEPA Method 3A. The CO<sub>2</sub> content of the exhaust was monitored using a single beam single wavelength (SBSW) infrared gas analyzer. The O<sub>2</sub> content of the exhaust was monitored using a gas analyzer that uses a paramagnetic sensor.

During each sampling period, a continuous sample of the RICE exhaust gas stream was extracted from the stack using a stainless steel probe connected to a Teflon® heated sample line. The sampled gas was conditioned by removing moisture prior to being introduced to the analyzers; therefore, measurement of O<sub>2</sub> and CO<sub>2</sub> concentrations correspond to standard dry gas conditions. Instrument response data were recorded using an ESC Model 8816 data acquisition system that monitored the analog output of the instrumental analyzers continuously and logged data as one-minute averages.

Prior to, and at the conclusion of each test, the instruments were calibrated using upscale calibration and zero gas to determine analyzer calibration error and system bias (described in Section 5.0 of this document). Sampling times were recorded on field data sheets.

Appendix 4 provides O<sub>2</sub> and CO<sub>2</sub> calculation sheets. Raw instrument response data are provided in Appendix 5.

#### **4.4 Exhaust Gas Moisture Content (USEPA Method 4)**

Moisture content of the RICE exhaust gas was determined in accordance with USEPA Method 4 using a chilled impinger sampling train. The moisture sampling was performed concurrently with the instrumental analyzer sampling. During each sampling period a gas sample was extracted at a nonisokinetic rate from the source where moisture was removed from the sampled gas stream using impingers that were submersed in an ice bath. At the conclusion of each sampling period, the moisture gain in the impingers was determined gravimetrically by weighing each impinger to determine net weight gain.

#### **4.5 NO<sub>x</sub> and CO Concentration Measurements (USEPA Methods 7E and 10)**

NO<sub>x</sub> and CO pollutant concentrations in the RICE exhaust gas stream was determined using a chemiluminescence NO<sub>x</sub> analyzer and an infrared CO analyzer.

Throughout each test period, a continuous sample of the engine exhaust gas was extracted from the stack using the Teflon® heated sample line and gas conditioning system and delivered to the instrumental analyzers. Instrument response for each analyzer was recorded on an ESC Model 8816

data acquisition system that logged data as one-minute averages. Prior to, and at the conclusion of each test, the instruments were calibrated using upscale calibration and zero gas to determine analyzer calibration error and system bias.

Appendix 4 provides CO and NO<sub>x</sub> calculation sheets. Raw instrument response data are provided in Appendix 5.

#### **4.6 Measurement of Volatile Organic Compounds (USEPA Method 25A/ALT-096)**

VOC emission rate was determined by measuring the nonmethane hydrocarbon (NMHC) concentration in the RICE exhaust gas. NMHC pollutant concentration was determined using a Thermo Environmental Instruments (TEI) Model 55i Methane / Nonmethane hydrocarbon analyzer. The TEI 55i analyzer contains an internal gas chromatograph column that separates methane from non-methane components and has been approved by the USEPA for measuring VOC relative to 40 CFR Part 60 Subpart JJJJ compliance test demonstrations (Alternative Test Method 096). The concentration of NMHC in the sampled gas stream, after separation from methane, is determined relative to a propane standard using a flame ionization detector in accordance with USEPA Method 25A.

Three (3) one-hour sampling periods were performed on each RICE exhaust. Throughout each one-hour test period, a continuous sample of the RICE exhaust gas was extracted from the stack using the Teflon® heated sample line described in Section 4.3 of this document, and delivered to the instrumental analyzer. The sampled gas was not conditioned prior to being introduced to the analyzer; therefore, the measurement of NMHC concentration corresponds to standard wet gas conditions. Instrument NMHC (VOC) response for the analyzer was recorded on an ESC Model 8816 data logging system that monitored the analog output of the instrumental analyzers continuously and logged data as one-minute averages. Prior to, and at the conclusion of each test, the instrument was calibrated using low-range calibration and zero gas to determine analyzer calibration error and system bias (described in Section 5.0 of this document).

Appendix 4 provides VOC calculation sheets. Raw instrument response data for the NMHC analyzer is provided in Appendix 5.

## **5.0 QA/QC ACTIVITIES**

### **5.1 NO<sub>x</sub> Converter Efficiency Test**

The NO<sub>2</sub> – NO conversion efficiency of the chemiluminescence NO<sub>x</sub> analyzer was verified prior to the testing program. A USEPA Protocol 1 certified concentration of NO<sub>2</sub> was injected directly into the analyzer, following the initial three-point calibration, to verify the analyzer's conversion efficiency. The analyzer's NO<sub>2</sub> – NO converter uses a catalyst at high temperatures to convert the NO<sub>2</sub> to NO for measurement. The conversion efficiency of the analyzer is deemed acceptable if the measured NO<sub>2</sub> concentration is at least 90% of the expected value.

The NO<sub>2</sub> – NO conversion efficiency test satisfied the USEPA Method 7E criteria (measured NO<sub>2</sub> concentration was 93.84% of the expected value, i.e., greater than 90% of the expected value as required by Method 7E).

### **5.2 Gas Divider Certification (USEPA Method 205)**

A STEC Model SGD-710C 10-step gas divider was used to obtain appropriate calibration span gases. The ten-step STEC gas divider was NIST certified (within the last 12 months) with a primary flow standard in accordance with Method 205. When cut with an appropriate zero gas, the ten-step STEC gas divider delivered calibration gas values ranging from 0% to 100% (in 10% step increments) of the USEPA Protocol 1 calibration gas that was introduced into the system. The field evaluation procedures presented in Section 3.2 of Method 205 were followed prior to use of gas divider. The field evaluation yielded no errors greater than 2% of the triplicate measured average and no errors greater than 2% from the expected values.

### **5.3 Instrumental Analyzer Interference Check**

The instrumental analyzers used to measure NO<sub>x</sub>, CO, O<sub>2</sub> and CO<sub>2</sub> have had an interference response test performed prior to their use in the field, pursuant to the interference response test procedures specified in USEPA Method 7E. The appropriate interference test gases (i.e., gases that would be encountered in the exhaust gas stream) were introduced into each analyzer, separately and as a mixture with the analyte that each analyzer is designed to measure. All of analyzers exhibited a composite deviation of less than 3.0% of the span for all measured interferent gases. No major analytical components of the analyzers have been replaced since performing the original interference tests.

### **5.4 Instrument Calibration and System Bias Checks**

At the beginning of each day of the testing program, initial three-point instrument calibrations were performed for the NO<sub>x</sub>, CO, CO<sub>2</sub> and O<sub>2</sub> analyzers by injecting calibration gas directly into the inlet sample port for each instrument. System bias checks were performed prior to and at the conclusion of each sampling period by introducing the upscale calibration gas and zero gas into the sampling system (at the base of the stainless steel sampling probe prior to the particulate

filter and Teflon® heated sample line) and determining the instrument response against the initial instrument calibration readings.

At the beginning of each test day, appropriate high-range, mid-range, and low-range span gases followed by a zero gas were introduced to the NMHC analyzer, in series at a tee connection, which is installed between the sample probe and the particulate filter, through a poppet check valve. After each one hour test period, mid-range and zero gases were re-introduced in series at the tee connection in the sampling system to check against the method's performance specifications for calibration drift and zero drift error.

The instruments were calibrated with USEPA Protocol 1 certified concentrations of CO<sub>2</sub>, O<sub>2</sub>, NO<sub>x</sub>, and CO in nitrogen and zeroed using hydrocarbon free nitrogen. The NMHC (VOC) instrument was calibrated with USEPA Protocol 1 certified concentrations of propane in air and zeroed using hydrocarbon-free air. A STEC Model SGD-710C ten-step gas divider was used to obtain intermediate calibration gas concentrations as needed.

#### **5.5 Determination of Exhaust Gas Stratification**

A stratification test was performed for the RICE exhaust stack. The stainless steel sample probe was positioned at sample points correlating to 16.7, 50.0 (centroid) and 83.3% of the stack diameter. Pollutant concentration data were recorded at each sample point for a minimum of twice the maximum system response time.

The recorded concentration data for the RICE exhaust stack indicated that the measured NO<sub>x</sub> concentrations did not vary by more than 5% of the mean across the stack diameter. Therefore, the RICE exhaust gas was considered to be unstratified and the compliance test sampling was performed at a single sampling location within the RICE exhaust stack.

#### **5.6 Meter Box Calibrations**

The metering console, which was used for exhaust gas moisture content sampling, was calibrated prior to and after the testing program. This calibration uses the critical orifice calibration technique presented in USEPA Method 5. The metering console calibration exhibited no data outside the acceptable ranges presented in USEPA Method 5.

The digital pyrometer in the metering console was calibrated using a NIST traceable Omega® Model CL 23A temperature calibrator.

Appendix 6 presents test equipment quality assurance data (NO<sub>2</sub> – NO conversion efficiency test data, instrument calibration and system bias check records, calibration gas and gas divider certifications, interference test results, meter box calibration records, Pitot tube calibration records).

## **6.0 RESULTS**

### **6.1 Test Results and Allowable Emission Limits**

Engine operating data and air pollutant emission measurement results for each one hour test period are presented in Tables 6.1 and 6.2.

The measured air pollutant concentrations and emission rates for Engine Nos. 1 and 2 are less than the allowable limits specified in MI-ROP-N1324-2012 for Emission Unit Nos. EUICEENGINE1 and EUICEENGINE2:

- 1.0 g/bhp-hr and 4.92 lb/hr for NO<sub>x</sub>;
- 3.3 g/bhp-hr and 16.23 lb/hr for CO; and
- 1.0 g/bhp-hr for VOC.

### **6.2 Variations from Normal Sampling Procedures or Operating Conditions**

The testing for all pollutants was performed in accordance with USEPA methods and the approved test protocol.

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Table 6.1 Measured exhaust gas conditions and NO<sub>x</sub>, CO and VOC air pollutant emission rates for Engine No. 1 (EUICEENGINE1)

Test No.	1	2	3	Three Test
Test date	1/7/16	1/7/16	1/7/16	Average
Test period (24-hr clock)	1300-1400	1425-1525	1552-1652	
Fuel flowrate (lb/hr)	2,208	2,216	2,221	2,215
Generator output (kW)	1,541	1,558	1,556	1,552
Engine output (bhp)	2,151	2,174	2,171	2,165
LFG methane content (%)	53.1	53.1	53.1	53.1
<u>Exhaust Gas Composition</u>				
CO <sub>2</sub> content (% vol)	11.2	11.2	11.2	11.2
O <sub>2</sub> content (% vol)	8.5	8.5	8.5	8.5
Moisture (% vol)	11.0	10.5	10.9	10.8
Exhaust gas temperature (°F)	831	831	833	833
Exhaust gas flowrate (dscfm)	4,270	4,286	4,312	4,289
Exhaust gas flowrate (scfm)	4,784	4,798	4,838	4,807
<u>Nitrogen Oxides</u>				
NO <sub>x</sub> conc. (ppmvd)	59.8	59.4	60.5	59.9
NO <sub>x</sub> emissions (lb/hr)	1.83	1.82	1.87	1.84
Permitted emissions (lb/hr)	-	-	-	4.92
NO <sub>x</sub> emissions (g/bhp*hr)	0.39	0.38	0.39	0.39
Permitted emissions (g/bhp*hr)	-	-	-	1.0
<u>Carbon Monoxide</u>				
CO conc. (ppmvd)	490	493	494	492
CO emissions (lb/hr)	9.1	9.2	9.3	9.2
Permitted emissions (lb/hr)	-	-	-	16.23
CO emissions (g/bhp*hr)	1.92	1.92	1.94	1.93
Permitted emissions (g/bhp*hr)	-	-	-	3.3
<u>Volatile Organic Compounds</u>				
VOC conc. (ppmv)	14.0	14.1	13.9	14.0
VOC emissions (lb/hr)	0.46	0.46	0.46	0.46
VOC emissions (g/bhp*hr)	0.10	0.10	0.10	0.10
Permitted emissions (g/bhp*hr)	-	-	-	1.0

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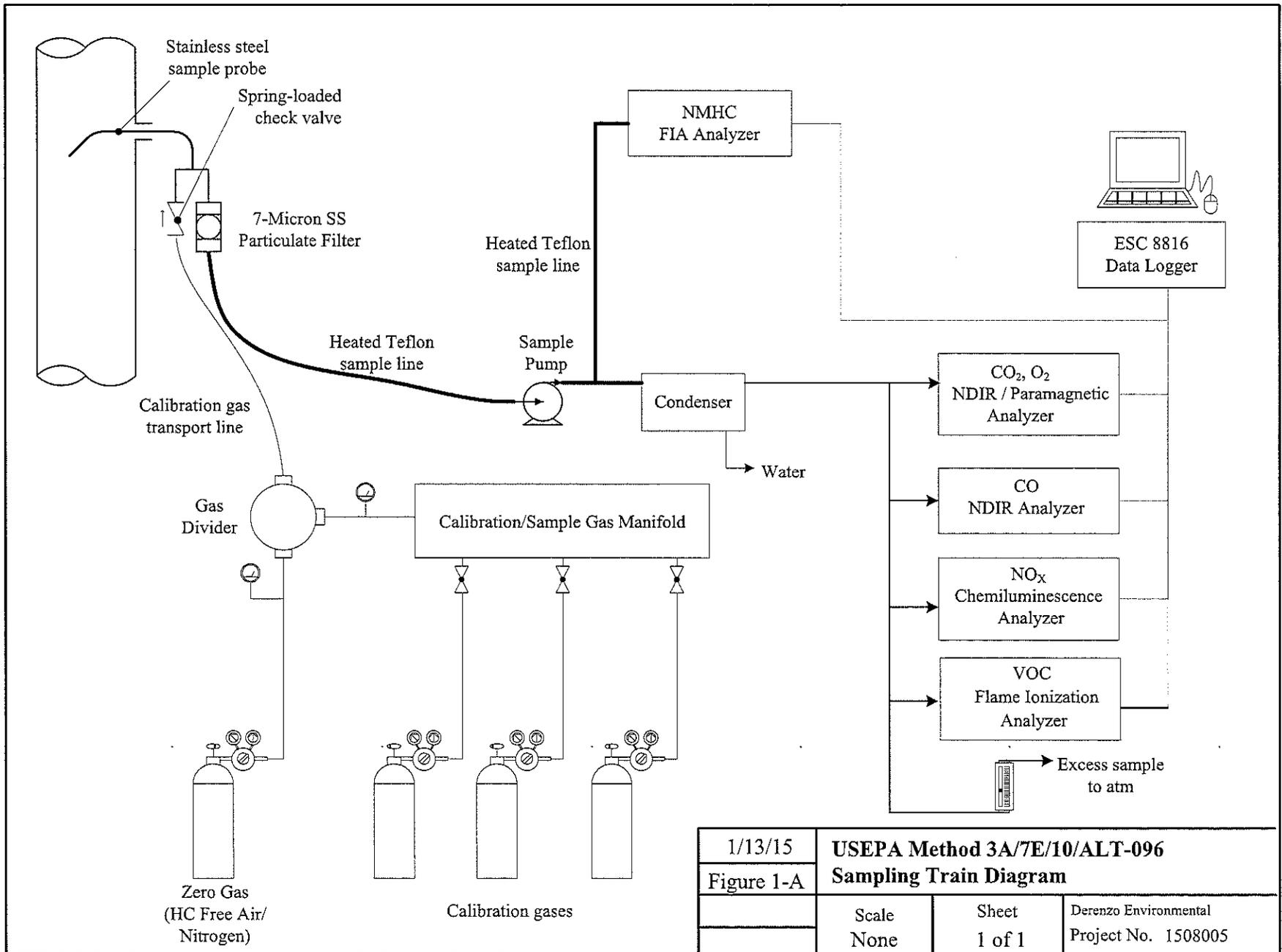
Table 6.2 Measured exhaust gas conditions and NO<sub>x</sub>, CO and VOC air pollutant emission rates for Engine No. 2 (EUICEENGINE2)

Test No.	1	2	3	
Test date	1/7/16	1/7/16	1/7/16	Three Test
Test period (24-hr clock)	836-936	1005-1105	1130-1230	Average
Fuel flowrate (lb/hr)	2,245	2,255	2,254	2,251
Generator output (kW)	1,557	1,561	1,556	1,558
Engine output (bhp)	2,172	2,178	2,172	2,174
LFG methane content (%)	53.1	53.0	53.0	53.0
<u>Exhaust Gas Composition</u>				
CO <sub>2</sub> content (% vol)	10.4	10.5	10.4	10.4
O <sub>2</sub> content (% vol)	9.38	9.29	9.29	9.32
Moisture (% vol)	10.6	10.6	10.8	10.7
Exhaust gas temperature (°F)	775	775	775	775
Exhaust gas flowrate (dscfm)	4,487	4,485	4,484	4,485
Exhaust gas flowrate (scfm)	5,020	5,021	5,026	5,022
<u>Nitrogen Oxides</u>				
NO <sub>x</sub> conc. (ppmvd)	81.2	76.1	77.7	78.4
NO <sub>x</sub> emissions (lb/hr)	2.61	2.45	2.50	2.52
Permitted emissions (lb/hr)	-	-	-	4.92
NO <sub>x</sub> emissions (g/bhp*hr)	0.55	0.51	0.52	0.53
Permitted emissions (g/bhp*hr)	-	-	-	1.0
<u>Carbon Monoxide</u>				
CO conc. (ppmvd)	643	642	648	644
CO emissions (lb/hr)	12.6	12.6	12.7	12.6
Permitted emissions (lb/hr)	-	-	-	16.23
CO emissions (g/bhp*hr)	2.63	2.61	2.65	2.63
Permitted emissions (g/bhp*hr)	-	-	-	3.3
<u>Volatile Organic Compounds</u>				
VOC conc. (ppmv)	21.4	21.4	21.5	21.4
VOC emissions (lb/hr)	0.74	0.74	0.74	0.74
VOC emissions (g/bhp*hr)	0.15	0.15	0.16	0.15
Permitted emissions (g/bhp*hr)	-	-	-	1.0

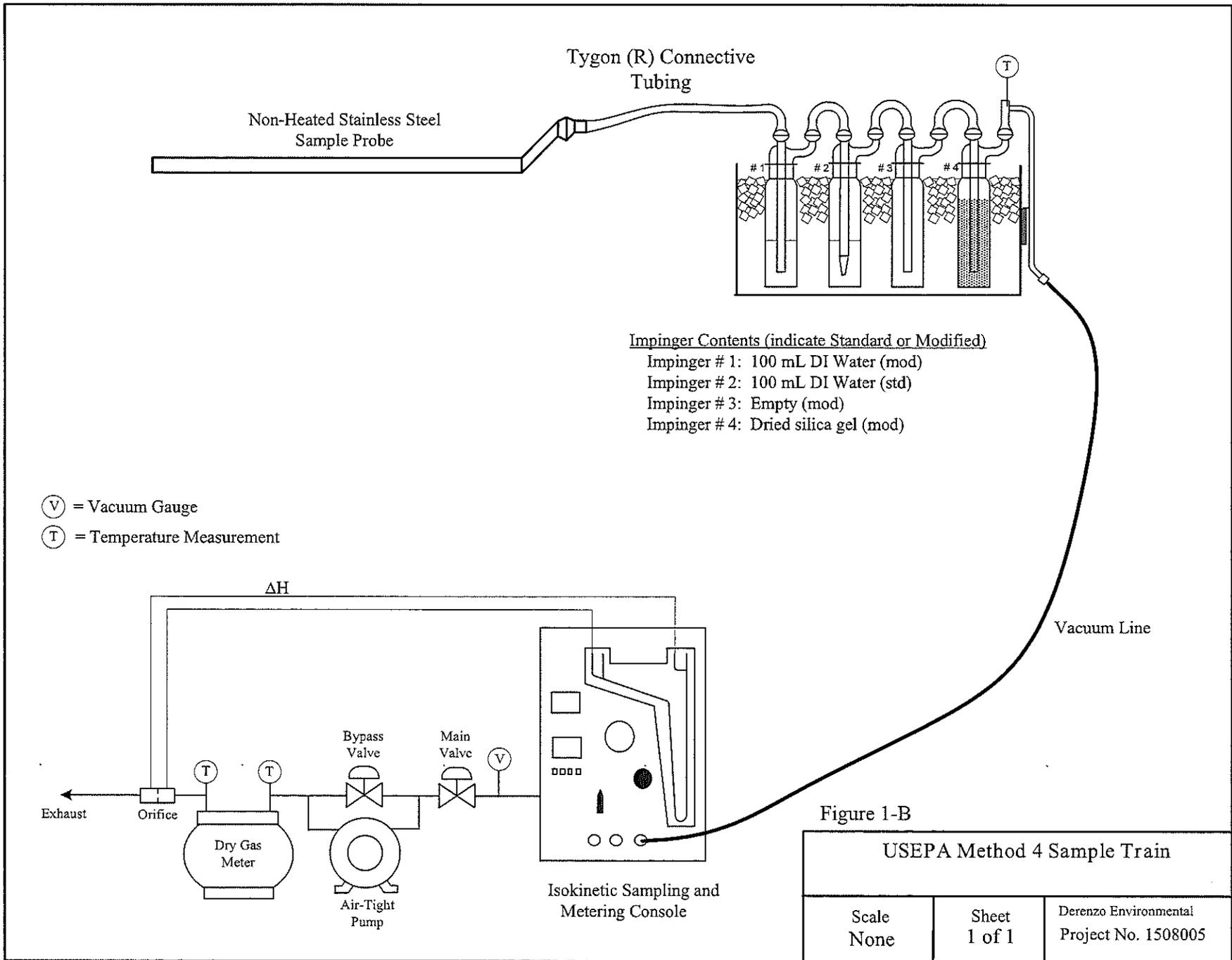
## **Derenzo Environmental Services**

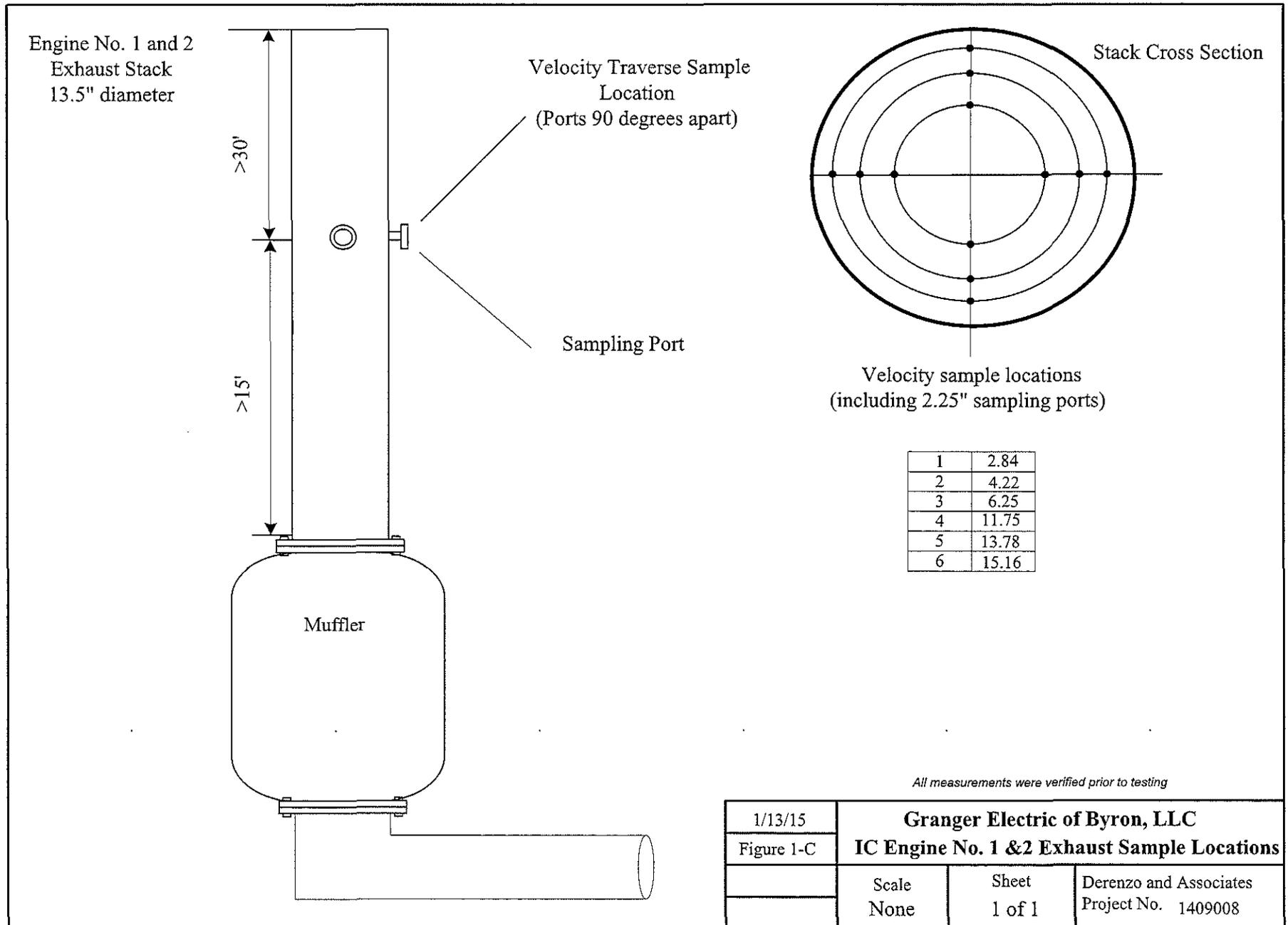
### **APPENDIX 1**

- Figures 1-A & 1-B – Sampling Train Diagrams
- Figure 1-C – IC Engines No. 1 & 2 Exhaust Sample Locations



1/13/15	<b>USEPA Method 3A/7E/10/ALT-096</b>		
Figure 1-A	<b>Sampling Train Diagram</b>		
	Scale	Sheet	Derenzo Environmental
	None	1 of 1	Project No. 1508005





1/13/15	<b>Granger Electric of Byron, LLC</b>		
Figure 1-C	<b>IC Engine No. 1 &amp; 2 Exhaust Sample Locations</b>		
	Scale	Sheet	Derenzo and Associates
	None	1 of 1	Project No. 1409008