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Annual RICE MACT Performance Emissions Testing Report

Upper Michigan Resource Corporation
A.J. Mihm Generating Station
EURICE1, EURICE2, and EURICE3
Pelkie, Michigan
Project No. M242108D
May 29 and 30, 2024

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Upper Michigan Resources Corporation
A.J. Mihm Generating Station
MI-ROP-P0796-2020
EURICE1, EURICE2, and EURICE3 Outlet Ducts
Pelkie, Michigan
May 29 and 30, 2024

Report Submittal Date
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Project No. M242108D

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1.0 EXECUTIVE SUMMARY

Mostardi Platt conducted a formaldehyde annual RICE MACT performance emissions test program for Upper Michigan Energy Resources Corporation (UMERC) on May 29 and 30, 2024 at the A. J. Mihm Generating Station on the Reciprocating Internal Combustion Engine EURICE1, EURICE2, and EURICE3 Outlet Ducts in Pelkie, Michigan. The purpose of the test program was to meet compliance demonstration requirements for emission rates in accordance with Renewable Operating Permit MI-ROP-P0796-2020 and the RICE MACT 40 CFR Part 63 Subpart ZZZZ. This report summarizes the results of the test program and test methods used.

The test locations, test dates, and test parameters are summarized below.

TEST INFORMATION		
Test Locations	**Test Date**	**Test Parameters**
EURICE1	May 29, 2024	Formaldehyde (CH_2O), Moisture (H_2O), and Oxygen (O_2)
EURICE2	May 30, 2024	
EURICE3	May 30, 2024	

A.J. Mihm Generating Station electric generation facility includes three (3) Wärtsilä W18V50SG natural gas-fired, four stroke, lean burn, spark ignition reciprocating internal combustion engines (RICE) coupled to 19,260 kW electric generators, a 1,000-kW natural gas-fired emergency generator, and one natural gas-fired natural gas conditioning heater. The RICE electric generating unit engines utilize pipeline quality natural gas and are equipped with selective catalytic reduction (SCR) for nitrogen oxides (NOx) control and oxidation catalyst systems for carbon monoxide (CO), volatile organic compound (VOC), and organic hazardous air pollutant (HAP) control. Each RICE electric generating unit exhausts into an individual stack.

Selected results of the test program are summarized below on a ppmvd @ 15% O_2 basis. A complete summary of emission test results follows the narrative portion of this report.

TEST RESULTS			
Test Location	**Test Parameter**	**Emission Limit**	**Actual Test Result**
EURICE1	CH_2O	14 ppmvd @ 15% O_2	0.7 ppmvd @ 15% O_2
EURICE2			1.2 ppmvd @ 15% O_2
EURICE3			0.9 ppmvd @ 15% O_2

Operating Data as provided by the plant is included in the appendix of this report.

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

TEST PERSONNEL INFORMATION		
Location	**Address**	**Contact**
Test Coordinator	WEC Energy Group, Inc 231 W. Michigan Street Milwaukee, Wisconsin 53203	Mr. Justin Kowalski Senior Environmental Consultant 414-221-2265 justin.kowalski@wecenergygroup.com
Test Facility	Upper Michigan Energy Resources Corporation A.J. Mihm Generating Station 16017 Sarya Road Pelkie, Michigan 49958	
Testing Company Representative	Mostardi Platt 888 Industrial Drive Elmhurst, Illinois 60126	Mr. Eric Ehlers Vice President, Field Operations (630) 993-2100 (phone) eehlers@mp-mail.com

The test crew consisted of A.Diaz, Z. Ehlers, and E. Ehlers of Mostardi Platt.

2.0 TEST METHODOLOGY

Emission testing was conducted following the methods specified in 40CFR60, Appendix A and 40CFR63, Appendix A. Schematics of the test section diagrams and sampling trains used, calculation nomenclature and example calculations, and reference method test data can be found in the appendix of this report.

The following methodology was used during the test program:

Method 3A Oxygen (O_2) Determination

Oxygen (O_2) concentrations were measured to determine formaldehyde emission concentrations in ppmvd corrected to 15% O_2 in accordance with Method 3A. A Brand Gaus analyzer was used to determine flue gas oxygen. All of the equipment used was calibrated in accordance with the specifications of the Method. Calibration data and copies of gas cylinder certifications are included in the appendix of this report.

Method 320 Formaldehyde (CH_2O) and Moisture (H_2O) Determination

The Method 320 sampling and measurement system meets the requirements of US EPA Reference Method 320, "Vapor Phase Organic and Inorganic Emissions by Extractive FTIR," 40CFR63, Appendix A. This method applies to the measurement of combustion gas concentrations. With this method, gas samples are extracted from the sample locations through heated Teflon sample lines to the analyzer.

FTIR technology works on the principle that most gases absorb infrared light. This is true for all compounds with the exception of homonuclear diatomic molecules and noble gases such as: N2, O2, H2, He, Ne, and Ar. Vibrations, stretches, bends, and rotations within the bonds of a molecule determine the infrared absorption distinctiveness. The absorption creates a "fingerprint" which is unique to each given compound.

The quantity of infrared light absorbed is proportional to the gas concentration. Most compounds have absorbencies at different infrared frequencies, allowing the simultaneous analysis of multiple

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compounds at one time. The FTIR software compares each sample spectrum to a user-selected list of calibration references and performs a classical least squares analysis to determine concentration data on a wet volume basis and the spectral residuals for each analyte (the error associated with each measurement). FTIR data was collected using an MKS MultiGas 2030 FTIR spectrometer. The FTIR was equipped with a temperature-controlled, 5.11-meter multi-pass gas cell maintained at 191°C. Gas flows and sampling system pressures were monitored using a rotameter and pressure transducer.

All data was collected at 0.5 cm^{-1} resolution. Each spectrum was derived from the coaddition of 62 scans, with a new data point generated approximately every one minute. Analyzer data for each run is present is Appendix E.

SAMPLING SYSTEM PARAMETERS				
MKS Serial #	**Sampling Line**	**Probe Assembly**	**Particulate Filter Media**	**Operating Temperatures**
000498	100' 3/8" dia., heated Teflon	Heated 8', 3/8" dia. SS	0.01µ heated borosilicate glass fiber	191°C

QA/QC procedures followed US EPA Method 320. See below for QA/QC procedure details and list of calibration gas standards. All calibration gases were introduced to the analyzer and the sampling system using an instrument grade stainless steel rotameter. All QA/QC procedures were within the acceptance criteria allowance of the applicable EPA methodology. See Appendix F for FTIR QA/QC Data and instrument linearity validations.

FTIR QA/QC PROCEDURES						
QA/QC Specification	**Purpose**	**Calibration Gas Analyte**	**Delivery**	**Frequency**	**Acceptance Criteria**	**Result**
M320: Zero	Verify that the FTIR is free of contaminants & zero the FTIR	Nitrogen (zero)	Direct to FTIR	pre/post test	< MDL or Noise	**Pass**
M320: Calibration Transfer Standard (CTS) Direct	Verify FTIR linearity, confirm optical path length	Ethylene	Direct to FTIR	pretest	+/- 5% cert. value	**Pass**
M320: Analyte Direct	Verify FTIR calibration	Formaldehyde, SF6	Direct to FTIR	pretest	+/- 30% cert. value	**Pass**
M320: CTS Response	Verify system linearity, recovery, response time	Ethylene	Sampling System	Daily, pre/post test	+/- 5% of Direct Measurement	**Pass**
M320: Zero Response	Verify sampling system has no bias for analytes of interest	Nitrogen	Sampling System	pretest	Bias correct data	**Pass**
M320: Analyte Spike	Verify system ability to deliver and quantify analyte of interest in the presence of effluent gases	Formaldehyde, SF6	Dynamic Addition to Sampling System, 1:10 effluent	Throughout testing – daily	+/- 30% theoretical recovery	**Pass**

Note: The determined concentrations from direct analyses were used in all system/spike recovery calculations.

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CALIBRATION GAS STANDARDS				
Components	**Concentration (ppm)**	**Vendor**	**Cylinder #**	**Standard Type**
Ethylene	109.7	Airgas	ALM025175	Certified Standard-Spec +/- 2%
Formaldehyde/ SF6	10.19/5.274	Airgas	EB0116247	Certified Standard +/- 2% (Formaldehyde) Certified Standard +/- 5% (SF_6)
Nitrogen	Zero Nitrogen	Airgas	N/A	UHP Grade

Analyte Spiking

Formaldehyde spiking was performed prior to testing to verify the ability of the sampling system to quantitatively deliver a sample containing formaldehyde from the base of the probe to the FTIR. Analyte spiking assures the ability of the FTIR sampling system to recover volatile organics in the presence of effluent gas.

As part of the spiking procedure, samples were measured to determine native formaldehyde concentrations to be used in the spike recovery calculations. The analyte spiking gases contained a low concentration of sulfur hexafluoride (SF_6). The determined SF_6 concentration in the spiked sample was used to calculate the dilution factor of the spike and thus used to calculate the concentration of the spiked formaldehyde. The spike target dilution ratio was 1:10 or less.

The following equation illustrates the percent recovery calculation.

$$DF = \frac{SF6(spk)}{SF6(direct)}$$ (Sec. 9.2.3 (3) USEPA Method 320)

$$CS = DF * Spike(dir) + Unspike(1 - DF)$$ (Sec. 9.2.3 (4) USEPA Method 320)

DF = Dilution factor of the spike gas
$SF_{6(dir)}$ = SF_6 concentration measured directly in undiluted spike gas
$SF_{6(spk)}$ = Diluted SF_6 concentration measured in a spiked sample
$Spike_{dir}$ = Concentration of the analyte in the spike standard measure by the FTIR directly
CS = Expected concentration of the spiked samples
Unspike= Native concentration of analytes in unspiked samples

Post Collection Data Validation

As part of the data validation procedure, reference spectra are manually fit to that of the sample spectra and a concentration is determined. The reference spectra are scaled to match the peak amplitude of the sample, providing a scaling factor. The scaling factor multiplied by the reference spectra concentration is used to determine the concentration value for the sample spectra. Sample pressure and temperature corrections are then applied to compute the final sample concentration. The manually calculated results are then compared with the software-generated results. The data is then validated if the two concentrations are within ± 20% agreement. In some cases, the percent difference between the two analyses is relatively large, but the absolute concentration difference is minimal. If this is not determined to be the case, then the spectra are reviewed for possible spectral interferences or any other possible causes leading to incorrectly quantified data. See Appendix F FTIR QAQC for manual subtractions.

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Detection Limit

The detection limit of each analyte was calculated following Annex A2 of ASTM D6348-12 procedure using spectra that contained similar amounts of moisture and carbon dioxide.

Analyte	Detection Limit (ppmv wet)	Detection Limit (%v)
Formaldehyde	**0.2**	**-**
Moisture	**-**	**0.1**

The spectral residuals for each compound is calculated using the classical least squares analysis. When the residual error exceeds the measured concentration, the compound is considered a non-detect, allowing the residual to verify the detection limit. The spectral residual also permits the analyst to determine if there are possible interferences in the sample matrix.

QA/QC data are found in Appendix F. Copies of gas cylinder certifications are found in Appendix G. All concentration data were recorded on a wet, volume basis. The sample and data collection followed the procedures outlined in Method 320.

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3.0 TEST RESULT SUMMARIES

Upper Michigan Energy Resources Corporation A.J. Mihm Generating Station EURICE1 Formaldehyde Summary								
Test No.	Date	Start Time	End Time	O_2 % (dry)	Moisture, %	CH2O ppmvw	CH2O ppmvd	CH2O ppmvd @ 15% O2
1	05/29/24	12:00	13:04	11.7	8.92	1.0	1.1	0.7
2	05/29/24	13:45	14:44	11.7	9.33	1.1	1.2	0.8
3	05/29/24	15:10	16:09	11.6	9.26	1.1	1.2	0.8
Average				11.6	9.17	1.1	1.2	0.7

Upper Michigan Energy Resources Corporation A.J. Mihm Generating Station EURICE2 Formaldehyde Summary								
Test No.	Date	Start Time	End Time	O_2 % (dry)	Moisture, %	CH2O ppmvw	CH2O ppmvd	CH2O ppmvd @ 15% O2
1	05/30/24	8:25	9:27	11.4	9.83	1.4	1.6	1.0
2	05/30/24	9:50	10:49	11.6	9.64	1.8	2.0	1.3
3	05/30/24	11:10	12:09	11.6	9.51	2.1	2.3	1.5
Average				11.5	9.66	1.8	2.0	1.2

Upper Michigan Energy Resources Corporation A.J. Mihm Generating Station EURICE3 Formaldehyde Summary								
Test No.	Date	Start Time	End Time	O_2 % (dry)	Moisture, %	CH2O ppmvw	CH2O ppmvd	CH2O ppmvd @ 15% O2
1	05/30/24	12:35	13:40	11.4	9.27	1.3	1.4	0.9
2	05/30/24	14:00	14:59	11.4	9.64	1.4	1.5	1.0
3	05/30/24	15:20	16:19	11.4	9.67	1.4	1.6	1.0
Average				11.4	9.53	1.4	1.5	0.9

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4.0 CERTIFICATION

Mostardi Platt is pleased to have been of service to Upper Michigan Energy Resources Corporation. If you have any questions regarding this test report, please do not hesitate to contact us at 630-993-2100.

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.

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Eric L. Ehlers — Program Manager

Scott W. Banach — Quality Assurance

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APPENDICES

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A.J. Mihm Generating Station
RICE Performance & Emission Rate Testing
40 CFR Part 60 Subpart JJJJ & Part 63 Subpart ZZZZ
Summary of Operating Data
May 29 & 30, 2024

EURICE1				
5/29/2024				
Method 2, 3A, 7E, 10, 25A and 320				
Start Time	*1200*	*13:45*	*15:10*	
End Time	*13:04*	*14:44*	*16:09*	
	Run 1	**Run 2**	**Run 3**	**Average**
Engine (kW)	18942	18939	18949	**18,943**
Engine natural gas use (pound/hour)	6540	6553	6563	**6,552**
SCR/Oxidation catalyst inlet temperature) (deg F)	708	708	705	**707**
Pressure drop across the oxidation catalyst (PSI)	0.13	0.13	0.13	**0.13**
Pressure drop across the SCR (PSI)	0.37	0.38	0.38	**0.37**
Urea injection rate to the SCR (gallons/hour)	5.1	4.8	4.7	**4.9**

EURICE2				
5/30/2024				
Method 3A, 7E, 10, 25A and 320				
Start Time	*825*	*950*	*1110*	
End Time	*927*	*1049*	*1209*	
	Run 1	**Run 2**	**Run 3**	**Average**
Engine (kW)	18,882	18,882	18,818	**18,861**
Engine natural gas use (pound/hour)	6,608	6,623	6,608	**6,613**
SCR/Oxidation catalyst inlet temperature) (deg F)	724	708	702	**711**
Pressure drop across the oxidation catalyst (PSI)	0.13	0.13	0.13	**0.13**
Pressure drop across the SCR (PSI)	0.23	0.26	0.26	**0.25**
Urea injection rate to the SCR (gallons/hour)	6.1	5.4	5.1	**5.5**

EURICE3				
5/30/2024				
Method 2, 3A, 7E, 10, 25A and 320				
Start Time	*1235*	*1400*	*1520*	
End Time	*1340*	*1459*	*1619*	
	Run 1	**Run 2**	**Run 3**	**Average**
Engine (kW)	18,890	18,886	18,888	**18,888**
Engine natural gas use (pound/hour)	6,528	6,545	6,555	**6,543**
SCR/Oxidation catalyst inlet temperature) (deg F)	715	714	714	**714**
Pressure drop across the oxidation catalyst (PSI)	0.13	0.13	0.13	**0.13**
Pressure drop across the SCR (PSI)	0.28	0.28	0.28	**0.28**
Urea injection rate to the SCR (gallons/hour)	8.1	7.7	7.6	**7.8**

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Appendix B - Test Section Diagram

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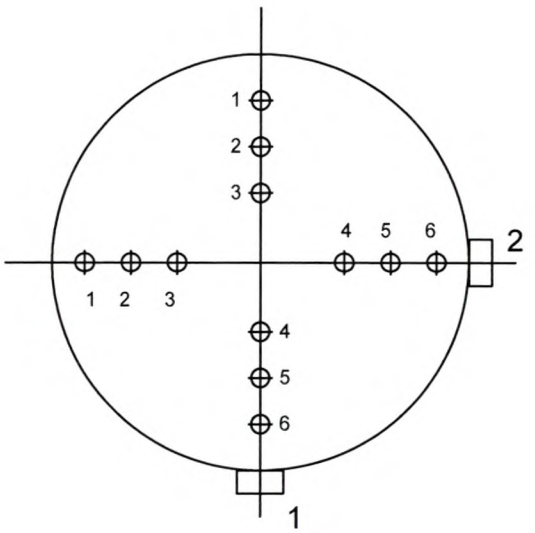
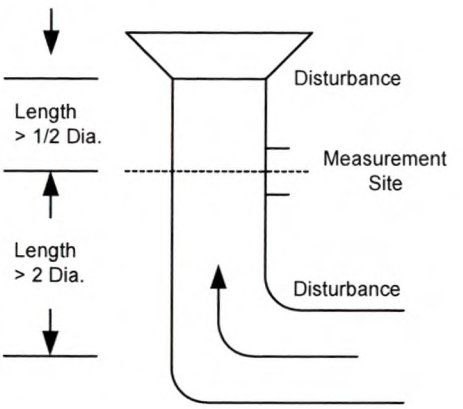
STRATIFICATION TRAVERSE FOR ROUND DUCTS





Job:	Upper Michigan Energy Resources Corporation A.J. Mihm Generating Station
Date:	May 29 and 30, 2024
Test Location:	EURICE1, 2, and 3 Outlet Ducts (identical)
Duct Diameter:	5.29 Feet
Duct Area:	21.98 Square Feet
No. Points Across Diameter:	6
No. of Ports:	2
Port Length:	8.0 Inches

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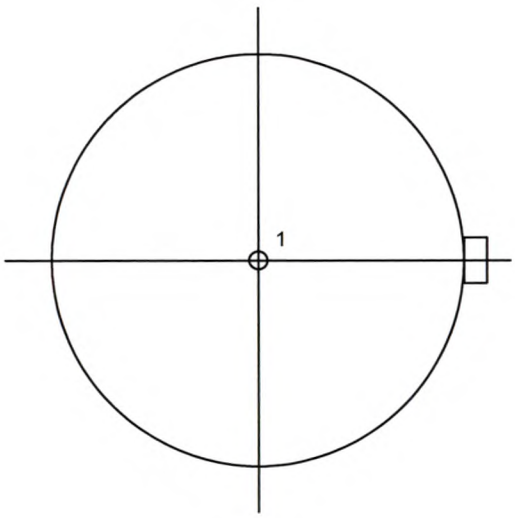
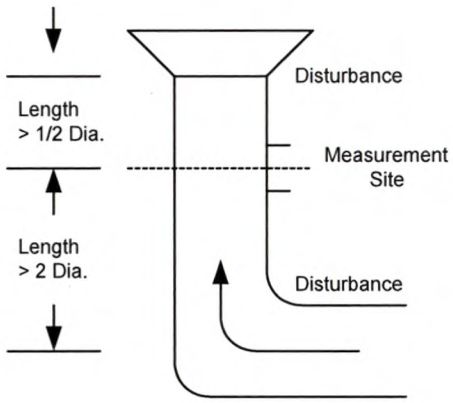
GASEOUS TRAVERSE FOR ROUND DUCTS





Job:	Upper Michigan Energy Resources Corporation A.J. Mihm Generating Station
Date:	May 29 and 30, 2024
Test Location:	EURICE1, 2, and 3 Outlet Ducts (identical)
Duct Diameter:	5.29 Feet
Duct Area:	21.98 Square Feet
No. Points Across Diameter:	1
No. of Ports:	1
Port Length:	8.0 Inches

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