

August 1, 2016

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STATE OF MICHIGAN
Department of Environmental Quality
Air Quality Division, Technical Programs Unit
P.O. Box 30260
Lansing, Michigan 48909-7760

AIR QUALITY DIV.

Subject: Bioworks Energy, LLC
40 CFR Part 60 Subpart JJJJ Compliance Test Report for a digester gas fueled
internal combustion engine

Derenzo Environmental Services performed emission source testing for BioWorks Energy, LLC (BioWorks Energy) to demonstrate initial compliance of a MAN Model No. E2876LE302 reciprocating internal combustion engine and generator set (RICE genset) located at the Flint Wastewater Treatment Plant in Flint, Genesee County.

This testing was performed to demonstrate compliance with the federal New Source Performance Standards (NSPS) for spark ignition (SI) RICE specified in 40 CFR Part 60 Subpart JJJJ.

Enclosed please find:

- A complete test report demonstrating compliance for the engine operated by BioWorks Energy
- A report certification signed by Mr. Chad Antle, the owner operator for BioWorks Energy, included in the document

Contact information is provided on the enclosed report certification should you have any questions or require additional information.

Sincerely,

DERENZO ENVIRONMENTAL SERVICES

Clay Gaffey 
Environmental Consultant

Enclosures

c: MDEQ-AQD, Lansing District Office



NSPS EMISSION TEST REPORT

Title NSPS EMISSION TEST REPORT FOR A DIGESTER GAS
 FUELED INTERNAL COMBUSTION ENGINE –
 GENERATOR SET

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Report Date July 7, 2016

AUG 01 2016

Test Dates June 15, 2016

AIR QUALITY DIV.

Facility Information	
Name	BioWorks Energy LLC
Street Address	G-4652 Beecher Road
City, County	Flint, Genesee

Facility Permit Information			
State Registration No.:	B1598	Permit No. :	N/A

Testing Contractor	
Company	Derenzo Environmental Services
Mailing Address	39395 Schoolcraft Road Livonia, MI 48150
Phone	(734) 464-3880
Project No.	1605009

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NSPS EMISSION TEST REPORT
FOR A
DIGESTER GAS FUELED INTERNAL COMBUSTION
ENGINE – GENERATOR SET

BIOWORKS ENERGY, LLC

1.0 INTRODUCTION

BioWorks Energy, LLC (BioWorks Energy) operates a digester-gas fired engine and generator set at the Flint Wastewater Treatment Plant (WWTP) in Flint, Genesee County, Michigan. The facility generates electricity using one (1) MAN Model No. E2876LE302 reciprocating internal combustion engine and generator set (RICE genset) rated at 225 kilowatts (kW).

The RICE genset operated by BioWorks Energy is exempt from the requirement to obtain an air permit (permit to install); however the engine is subject to the federal New Source Performance Standards (NSPS) for spark ignition (SI) RICE specified in 40 CFR Part 60 Subpart JJJJ.

§60.4233 (e) states that *Owners and operators of stationary SI ICE with a maximum engine power greater than or equal to 75 kW (except gasoline and rich burn engines that use LPG) must comply with the emission standards in Table 1 to this subpart for their stationary SI ICE.*

Table 1 of Subpart JJJJ indicates the following emission limits for stationary engines which are manufactured after January 1, 2011 and are less than 500 hP:

- 150 ppmvd nitrogen oxides (NO_x) at 15% oxygen (O₂);
- 610 ppmvd carbon monoxide (CO) at 15% O₂; and
- 80 ppmvd volatile organic compounds (VOC) at 15% O₂.

The NSPS requires that the owner/operator perform an initial performance test to demonstrate that the engine is operated in compliance with the emission standards.

The compliance testing was performed by Derenzo Environmental Services (DES) representatives Jason Logan and Clay Gaffey. The exhaust gas sampling and analysis was performed using procedures specified in the Test Plan dated May 16, 2016 that was submitted to the Michigan Department of Environmental Quality (MDEQ) prior to the test event. Testing was originally scheduled to occur on June 14, 2016 but was postponed to June 15, 2016 due to a mechanical issue with the RICE genset. Mr. Nathan Hude from the MDEQ was on-site to observe portions of the test event.

Derenzo Environmental Services

BioWorks Energy, LLC
Digester Gas Engine Test Report

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Questions regarding this emission test report should be directed to:

Clay Gaffey
Environmental Consultant
Derenzo Environmental Services
4180 Keller Road
Holt, MI 48842
Ph: (517) 268-0043

Mr. Chad Antle
Owner
BioWorks Energy, LLC
P.O. Box 773
Grand Blanc, MI 48480
Ph: (704) 972-2499

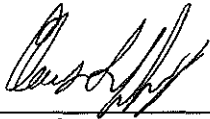
Report Certification

This test report was prepared by Derenzo Environmental Services based on field sampling data collected by DES personnel. Facility process data were collected and provided by BioWorks Energy employees or representatives. This test report has been reviewed by BioWorks Energy representatives and approved for submittal to the MDEQ.

I certify that the testing was conducted in accordance with the approved 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:



Clay Gaffey
Environmental Consultant
Derenzo Environmental Services



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

I certify that the facility operating conditions were in compliance with permit requirements or were at the maximum routine operating conditions for the facility. Based on information and belief formed after reasonable inquiry, the statements and information in this report are true, accurate and complete.



Chad Antle
Owner
BioWorks Energy, LLC.

2.0 SOURCE AND SAMPLING LOCATION DESCRIPTION

2.1 General Process Description

Biogas containing methane is generated at the Flint WWTP from the anaerobic decomposition of wastewater sludge. The biogas (digester gas) is used to fuel the MAN Model No. E2876LE302 RICE, which 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 electricity generator has a rated electrical output of 225kW. However, due to the size of the engine, output is limited to a maximum of 190kW.

The MAN RICE is not equipped with add-on emission controls. Combustion air pollutant emissions are minimized by the design of the engine and operation of the electronic air to fuel ratio controller. Engine exhaust gas is released directly to atmosphere through a vertical stack without add-on post-combustion emission controls.

The fuel consumption rate is dependent on the fuel heat value (methane content). The engine will use an appropriate amount of fuel to maintain the desired output. The air-to-fuel ratio is set based on the gas quality (methane or heat content) of the digester gas that is used as fuel.

2.3 Sampling Locations

The RICE exhaust gas is directed through a muffler and is released to the atmosphere through a dedicated vertical exhaust stack.

The exhaust stack sampling port for the RICE (ENG01) is located in an exhaust stack with an inner diameter of 6 inches. The stack is equipped with a single sample port, that provides a sampling location >3 inches (greater than 0.5 duct diameters) upstream and >12 inches (greater than 2.0 duct diameters) downstream from any flow disturbance and satisfies the USEPA Method 1 criteria for a representative sample location.

Appendix 1 provides diagrams of the emission test sampling location.

3.0 SUMMARY OF TEST RESULTS AND OPERATING CONDITIONS

3.1 Purpose and Objective of the Tests

Pursuant to 40 CFR Part 60 Subpart JJJJ, BioWorks Energy is required to test the RICE air pollutant emissions after initial startup to demonstrate compliance with the emission standards for CO, NO_x, and VOC.

3.2 Operating Conditions During the Compliance Tests

The testing was performed while the RICE genset was operated at maximum operating conditions (190 kW electricity output +/- 10%). BioWorks Energy representatives provided kW output data at 15-minute intervals for each test period.

Fuel flowrate (cubic feet per minute) was also recorded by BioWorks Energy representatives at 15-minute intervals for each test period. The facility is not equipped with instrumentation to record methane content throughout the tests. The RICE fuel consumption rate ranged between 53.4 and 55.4 standard cubic feet per minute (scfm) during the test periods.

According to information provided by BioWorks Energy, the fuel sulfur content of the digester gas used is 50ppm. The fuel methane content was tested prior to the stack testing event and was determined to be 66% by volume. The fuel heat content was determined to be 660Btu per cubic foot (cf) high heating value (HHV) and 590Btu/cf lower heating value (LHV).

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

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 digester gas fueled RICE were sampled for three (3) one-hour test periods during the compliance testing performed June 15, 2016.

Table 3.2 presents the average measured CO, NO_x and VOC exhaust gas concentrations for the engine (average of the three test periods) and applicable emission limits.

Results of the engine performance tests demonstrate compliance with emission limits specified in 40 CFR Part 60, Subpart JJJJ.

Results and data for each one-hour sampling period are presented in Section 6.0 of this report.

Table 3.1 Average engine operating conditions during the test periods

Emission Unit	Generator Output (kW)	Fuel Use (scfm)	Digester Gas CH ₄ Content (%)
ENG-01	185	54.1	66
Max Capacity	190	--	--

Table 3.2 Average measured exhaust gas concentrations for the RICE (three-test average)

Emission Unit	CO Emissions (ppmvd @15%O ₂)	NO _x Emissions (ppmvd @15%O ₂)	VOC Emissions ¹ (ppmvd @15%O ₂)
ENG-01	144	123	2.8
NSPS Limit	610	150	80

1. Measured as propane (C₃)

4.0 SAMPLING AND ANALYTICAL PROCEDURES

A test protocol for the air emission testing was provided to MDEQ prior to performing the field sampling and testing. 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 3A	Exhaust gas O ₂ content was determined using a zirconia ion/paramagnetic instrumental analyzers.
USEPA Method 4	Exhaust gas moisture was determined based on the water weight gain in chilled impingers.
USEPA Method 7E	Exhaust gas NO _x concentration was determined using chemiluminescence instrumental analyzers.
USEPA Method 10	Exhaust gas CO concentration was measured using NDIR instrumental analyzers.
USEPA Method 25A /ALT-096	Exhaust gas VOC (as NMHC) concentration was determined using a flame ionization analyzer equipped with a methane separation column.

4.2 Exhaust Gas Molecular Weight Determination (USEPA Method 3A)

O₂ content in the RICE exhaust gas stream was measured continuously throughout each test period in accordance with USEPA Method 3A. The O₂ content of the exhaust was monitored using a Servomex 4900 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, O₂ content measurements corresponds 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 analyzer continuously and logged data as one-minute averages.

Prior to, and at the conclusion of each test, the instrument was 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 3 provides a summary of exhaust gas O₂ content measurements. Raw instrument response data are provided in Appendix 4.

4.3 Exhaust Gas Moisture Content (USEPA Method 4)

The 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 constant 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. Moisture sampling was performed from a single centroid location.

4.4 NO_x and CO Concentration Measurements (USEPA Methods 7E and 10)

NO_x and CO pollutant concentrations in the RICE exhaust gas streams were determined using a Thermo Environmental Instruments, Inc. (TEI) Model 42c High Level chemiluminescence NO_x analyzer and a California Analytics / Fuji Model ZRF infrared CO analyzer.

A continuous sample of the RICE exhaust gas was delivered to the instrumental analyzers using the sampling and conditioning system described previously in this section. Prior to, and at the conclusion of each test, the instruments were calibrated using appropriate upscale calibration and zero gas to determine analyzer calibration error and system bias.

Appendix 3 provides CO and NO_x calculation sheets. Raw instrument response data are provided in Appendix 4.

4.5 Measurement of Volatile Organic Compounds (USEPA Method 25A / ALT-096)

VOC emissions were determined by measuring the non-methane hydrocarbon (NMHC) concentration in the RICE exhaust gas. NMHC pollutant concentration was determined using a Thermo Environmental Instruments (TEI) Model 55i Methane / Non-methane 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 or ALT-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.

Samples of the exhaust gas were delivered directly to the instrumental analyzer using the Teflon[®] heated sample line to prevent condensation. The sample to the NMHC analyzer was not conditioned to remove moisture. Therefore, VOC measurements correspond to standard conditions with no moisture correction (wet basis). The measured VOC/NMHC concentration values were corrected to dry gas conditions (ppmvd) using the measured exhaust gas moisture content.

The instrumental analyzer was calibrated using certified propane concentrations in hydrocarbon-free air to demonstrate detector linearity and determine drift error.

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Derenzo Environmental Services

BioWorks Energy, LLC
Digester Gas Engine Test Report

Appendix 3 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_x Converter Efficiency Test

The NO₂ – NO conversion efficiency of the Model 42c analyzer was verified prior to the testing program. A USEPA Protocol 1 certified concentration of NO₂ was injected directly into the analyzer, following the initial three-point calibration, to verify the analyzer's conversion efficiency. The analyzer's NO₂ – NO converter uses a catalyst at high temperatures to convert the NO₂ to NO for measurement. The conversion efficiency of the analyzer is deemed acceptable if the measured NO₂ concentration is greater than 90% of the expected value.

The NO₂ – NO conversion efficiency test satisfied the USEPA Method 7E criteria (the measured NO₂ concentration was within 2% of the expected value).

5.2 Sampling System Response Time Determination

The response time of the sampling system was determined prior to the compliance test program by introducing upscale gas and zero gas, in series, into the sampling system using a tee connection at the base of the sample probe. The elapsed time for the analyzer to display a reading of 95% of the expected concentration was determined using a stopwatch.

The TEI Model 55i analyzer exhibited the longest system response time at 110 seconds. Results of the response time determinations were recorded on field data sheets. For each test period, test data were collected once the sample probe was in position for at least twice the maximum system response time.

5.3 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 previous 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.

5.4 Instrumental Analyzer Interference Check

The instrumental analyzers used to measure NO_x, CO, and O₂ 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.

5.5 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_x, CO, and O₂ 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 O₂, NO_x, 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.

5.6 Determination of Exhaust Gas Stratification

A stratification test for each RICE exhaust stack was performed during the first performance test sampling periods. 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 data for each RICE exhaust stack gas indicate that the measured NO_x concentrations did not vary by more than 5% of the mean across the stack diameter. Therefore, the RICE stack gas was considered to be non-stratified and the compliance test sampling was performed at a single sampling location within the RICE exhaust stack.

5.7 Meter Box Calibrations

The dry gas 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 Clean Air metering console was calibrated using a NIST traceable Omega[®] Model CL 23A temperature calibrator.

Appendix 5 presents test equipment quality assurance data (NO₂ – 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, stratification checks).

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 Table 6.1.

Table 1 of Subpart JJJJ indicates the following emission limits for stationary engines which are manufactured after January 1, 2011 and are less than 500 hp:

- 150 ppmvd NO_x at 15% O₂;
- 610 ppmvd CO at 15% O₂; and
- 80 ppmvd VOC at 15% O₂.

The measured CO, NO_x and VOC exhaust gas concentrations for Engine No. 1 (ENG-01) are less than the limits specified in the SI-RICE NSPS.

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. The testing was originally scheduled for June 14, 2016 but was postponed due to an engine malfunction that required the head to be replaced. The MDEQ was made aware of the postponement on June 14, 2016 (on-site discussion with Mr. Dave Patterson). Testing occurred on June 15, 2016 and was observed, in part, by Mr. Nathan Hude of the MDEQ.

Table 6.1 Measured exhaust gas conditions and NOx, CO and VOC air pollutant emission rates
 ENG-01

Test Number:	1	2	3	
Test Date:	06/15/16	06/15/16	06/15/16	Three
Test Period Begin:	13:30	14:55	16:25	Test
Test Period End:	14:30	15:55	17:25	Average
Engine operating parameters				
Generator Output (kW)	185	185	185	185
Fuel Use Rate (scfm)	54.95	53.84	53.52	54.10
Exhaust gas composition				
O ₂ content (% vol)	7.2	7.1	7.1	7.1
Moisture (% vol)	13.0	14.1	13.3	13.4
NOx emission rates				
NOx concentration (ppmvd)	282	293	283	286
NOx corrected to 15% O ₂	122	125	121	123
<i>NOx permit limit (ppmvd 15% O₂)</i>	-	-	-	150
CO emission rates				
CO concentration (ppmvd)	333	337	339	336
CO corrected to 15% O ₂	144	144	145	144
<i>CO permit limit (ppmvd 15% O₂)</i>	-	-	-	610
VOC emission rates				
VOC concentration (ppmv C ₃)	5.3	4.9	7.0	5.7
VOC corrected to 15% O ₂ , dry	2.6	2.4	3.5	2.8
<i>VOC permit limit (ppmvd 15% O₂)</i>	-	-	-	80



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
LANSING



KEITH CREAGH
DIRECTOR

May 26, 2016

Mr. Jason Logan
Derenzo Environmental Services
39395 Schoolcraft Road
Livonia, Michigan 48150

Dear Mr. Logan:

SUBJECT: BioWorks Energy, LLC, Digester Engine emissions testing; SRN: B1598

The protocol for testing the digester engine at BioWorks, LLC has been reviewed by the Air Quality Division. The engine will be tested for NOx, CO, and VOC. This testing is required by 40 CFR Part 60, Subpart JJJJ.

Testing will be performed in accordance with 40 CFR Part 60, Appendix A, Methods 3A, 4, 7E, 10, 25A and Alt 096. Testing will consist of three 1-hour test runs for NOx, CO, and VOC on each engine. The engine will operate within 10% of design capacity during testing. All requirements and specifications of the above methods apply, and any modifications of the test methods onsite must be approved by the Air Quality Division.

The following process data will be recorded during each run:

- Engine output (kW)
- Fuel use
- Fuel sulfur content analysis (within past 6 months) *50 ppm*
- Fuel heat content (Btu/cubic foot, within past 6 months) *66% 660 BTU/cf - 590 BTU/cf*

The test report will include:

- The gas analyzer calibration error, system bias, zero and calibration drift data, and run data, all in tabular format
- Field data sheets including hand written data
- The process data listed above
- All aborted or failed runs must be included in the report

A complete copy of the final test results must be sent to the following two addresses:


Mr. Nathan Hude
Air Quality Division
Constitution Hall, 1st Floor South
525 W. Allegan St.
Lansing, MI 48909

Ms. Karen Kajiya-Mills
Supervisor, TPU
Air Quality Division
PO Box 30260
Lansing, MI 48909

Mr. Jason Logan
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May 26, 2016

This testing is scheduled for June 14, 2016. Please advise Mr. Nathan Hude of the Lansing District Office at, 517-284-6779, and me of any changes in the test date. If you have any questions regarding this letter, please contact me by telephone or e-mail at pattersond2@michigan.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "David Patterson". The signature is fluid and cursive, with the first name "David" written in a larger, more prominent script than the last name "Patterson".

David Patterson
Technical Programs Unit
Field Operations Section
Air Quality Division
517-284-6782

cc: Mr. Chad Antle, BioWorks Energy, LLC
Mr. Brady Myott, AQD
Mr. Nathan Hude