

Report of ...

# MATS Emission Testing

Performed for ...

Grand Haven Board of Light and Power  
J.B. Sims Generating Station

Grand Haven, Michigan

On

Boiler #3 FGD Exhaust

October 29, 2019

Project #: 245.15

By...

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Grand Rapids, MI

performed for the

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## **I. INTRODUCTION**

Network Environmental, Inc. was retained by Grand Haven Board Of Light and Power of Grand Haven, Michigan to conduct an emission study at the Sims Generating Station. The purpose of the study was to determine the HCL emissions from the boiler to document compliance with EPA MATS and Michigan ROP# MI-ROP-B1976-2018.

The pollutants monitored and test methods used were as follows:

- Hydrogen Chloride (HCL) – U.S. EPA Reference Method 26A MATS
- Exhaust Gas Parameters (air flow rate, temperature, moisture & density) – U.S. EPA Methods 1-4

The emission limits for this source are:

Hydrogen Chloride (HCL) – 0.0020 Lbs/mmBTU

The sampling was conducted on October 29, 2019 by R. Scott Cargill and Richard D. Eerdmans of Network Environmental, Inc. Assisting in the study was Mr. Paul Cederquist and Mr. Chris Morse of Grand Haven Board of Light and Power.

Mr. Jeremy Howe and Ms. Kaitlyn Devries of the Michigan Department of Environment, Great Lakes & Energy (EGLE) – Air Quality Division were present to observe the testing and source operation.

**II. PRESENTATION OF RESULTS**

**II.1 TABLE 1  
HCl EMISSION RESULTS SUMMARY  
BOILER 3  
GRAND HAVEN BLP  
GRAND HAVEN, MICHIGAN  
OCTOBER 29, 2019**

Compound	Sample	Time	Air Flow Rate DSCFM <sup>(1)</sup>	%CO <sub>2</sub> <sup>(2)</sup>	Lbs/Hr <sup>(3)</sup>	Lbs/mmBTU <sup>(4)</sup>
HCl	1	8:49-10:48	151,458	8.5	0.071	1.66E <sup>-4</sup>
	2	11:12-13:08	151,354	7.5	0.071	1.86E <sup>-4</sup>
	3	13:26-15:22	151,788	8.5	0.132	3.06E <sup>-4</sup>
	<b>Average</b>		<b>151,533</b>	<b>8.2</b>	<b>0.091</b>	<b>2.19E<sup>-4</sup></b>

- (1) DSCFM = Dry Standard Cubic Feet Per Minute (Standard Temperature & Pressure = 68 °F & 29.92 in. Hg)
- (2) %CO<sub>2</sub> = Percent Carbon Dioxide On A Dry Basis
- (3) Lbs/Hr = Pounds of HCL per hour
- (4) Lbs/MMBTU = Pounds Per Million BTU of Heat Input (Calculated using Equation 19-6 from EPA Method 19 with an F<sub>c</sub> of 1,800)

### **III. DISCUSSION OF RESULTS**

The results of the testing are summarized in Table 1 (Section II.1) as follows:

Table 1 – HCl Emission Results

- Air Flow Rate (DSCFM) – Dry Standard Cubic Feet Per Minute (STP = 68 °F & 29.92 in. Hg)
- % CO<sub>2</sub> – Percent Carbon Dioxide
- Mass Emission Rates (Lbs/MMBTU) – Pounds Per Million BTU Of Heat Input (Calculated Using Equation 19-6 From EPA Method 19 With An F<sub>c</sub> Of 1,800) and Pounds Per Hour (Lbs/Hr).

### **IV. SAMPLING AND ANALYTICAL PROTOCOL**

The sampling location for the boiler exhaust was on the 160 inch diameter exhaust at a location that meets the minimum requirements of U.S. EPA Method 1. There were 4 sample ports and 24 sampling points (6 per port) used for the testing.

Prior to the sampling, a preliminary cyclonic/turbulent flow check was conducted on the exhaust stack. The sampling met the requirements of Method 1.

Twenty four (24) sampling points (6 per port) were used for the isokinetic sampling. The sampling point dimensions for the isokinetic sampling were as follows:

<u>Sample Point</u>	<u>Dimension (Inches)</u>
1	3.36
2	10.72
3	18.88
4	28.32
5	40.00
6	56.96

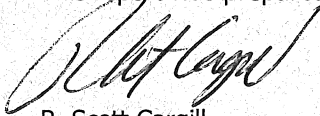
**IV.1 HCl** – The HCL emission sampling was conducted in accordance with U.S. EPA Method 26A MATS. The sampling was performed isokinetically in accordance with the method. The HCL was collected in the first two impingers of the sampling train, which contained 100 mls of 0.1 normal sulfuric acid. The probe

rinse and the impinger catch were combined and analyzed for HCL using Ion-chromatography as described in the method. The filter was heated to between 248°F and 273°F

Three (3) samples were collected from the exhaust. Each sample was ninety-six (96) minutes in duration with a minimum sample volume of 1.5 dry standard cubic meters. All the quality assurance and quality control requirements specified in the methods were incorporated in the sampling and analysis. A diagram of the sampling train is shown in Figure 1.

**IV.2 Exhaust Gas Parameters** – The exhaust gas parameters (air flow rate, temperature, moisture and density) were determined in conjunction with the other sampling by employing U.S. EPA Methods 1 through 4. Air flow rates, temperatures and moistures were determined using the isokinetic sampling trains. Oxygen & carbon dioxide were determined by Orsat in order to determine gas density.

This report was prepared by:

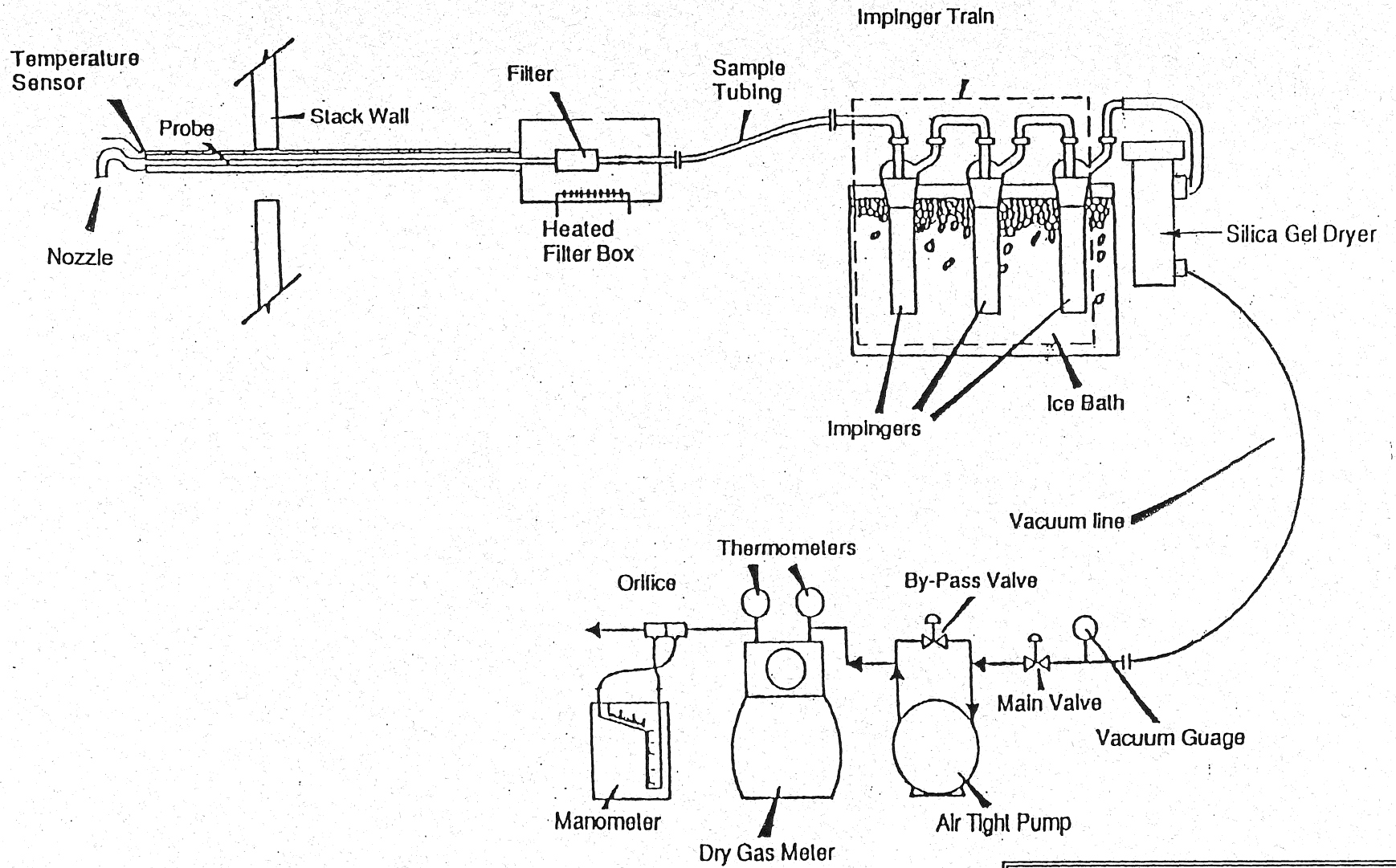


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Figure 1  
HCl Sampling Train