EMISSIONS TEST REPORT

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NOV 1 0 2016 AIR QUALITY DIV.

for

CARBON MONOXIDE (CO) EMISSIONS

ENGINES 1 & 2

DTE-Gas Columbus Compressor Station Columbus Township, Michigan

September 20 & 28, 2016

Prepared By Environmental Management & Resources Environmental Field Services Group DTE Corporate Services, LLC 7940 Livernois H-136 Detroit, MI 48210







CONTENTS

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| Ч. ¥., | Sect | | | Page | | | | | | | |
|--------|-------------------|-------------|---|------|--|--|--|--|--|--|--|
| tes) \ | | f darage to | ₩., | | | | | | | | |
| | EXECUTIVE SUMMARY | | | | | | | | | | |
| | 1.0 | INT | RODUCTION | 1 | | | | | | | |
| | 2.0 | sou | JRCE DESCRIPTION | 1 | | | | | | | |
| | 3.0 | SAP | MPLING AND ANALYTICAL PROCEDURES | 2 | | | | | | | |
| | 3.1 | ох | 2 | | | | | | | | |
| | | 3.1.1 | Sampling Method | | | | | | | | |
| | | 3.1.2 | O ₂ and CO Sampling Train | | | | | | | | |
| | | 3.1.3 | Sampling Duration & Frequency | 3 | | | | | | | |
| | | 3.1.4 | Quality Control and Assurance (O ₂ and CO) | 3 | | | | | | | |
| | | 3.1.5 | Data Reduction | 3 | | | | | | | |
| | 4.0 | OPI | ERATING PARAMETERS | 3 | | | | | | | |
| | 5.0 | DIS | CUSSION OF RESULTS | 3 | | | | | | | |
| | 6.0 | CER | TIFICATION STATEMENT | 4 | | | | | | | |

RESULTS TABLES

| Table No. 1 | Engine 1 CO Emission Testing Results |
|-------------|--------------------------------------|
| Table No. 2 | Engine 2 CO Emission Testing Results |



FIGURES

- 1 Engines 1 & 2 Stack Drawing & Exhaust Sampling Point Location
- 2 USEPA Method 3A and 10 Sampling Train

APPENDICES

- A MDEQ Test Plan and Approval Letter
- B Raw Analyzer Data
- C Equipment and Analyzer Calibration Data
- D Operational Data
- E Example Calculations



EXECUTIVE SUMMARY

DTE Energy's Environmental Management and Resources (EM&R), Field Services Group, performed emissions testing at the DTE-Gas Columbus Compressor Station, located in Columbus, Michigan. The fieldwork, performed on September 20 & 28, 2016, was conducted to satisfy requirements of the Michigan Air Renewable Operating Permit No. B6480-2012d and 40 CFR Part 63 NESHAP Subpart ZZZZ. Emission testing was performed on Engines 1 & 2 at the inlet and outlet of each engine's catalyst.

The results of the emissions testing are highlighted below:

Emissions Testing Summary Columbus Compressor Station Engines 1 & 2 September 20 & 28, 2016

| Parameter | Engine 1 (9/28) | Engine 2 (9/20) | |
|--|--------------------|--------------------|--|
| Average Inlet Carbon Monoxide Emissions (gram/BHP-Hr, dry) | 0.55 | 0.98 | |
| Average Outlet Carbon Monoxide Emissions (gram/BHP-Hr, dry) | 0.003 | 0.001 | |
| Average Carbon Monoxide Reduction Efficiency (93%) ⁽¹⁾ | 99.4 | 99.9 | |

⁽¹⁾ (Permit Limit)



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1.0 INTRODUCTION

DTE Energy's Environmental Management and Resources (EM&R), Field Services Group, performed emissions testing at the DTE-Gas Columbus Compressor Station, located in Columbus, Michigan. The fieldwork, performed on September 20 & 28, 2016, was conducted to satisfy requirements of the Michigan Air Renewable Operating Permit No. B6480-2012d and 40 CFR Part 63 NESHAP Subpart ZZZZ. Emission testing was performed on Engines 1 & 2 at the inlet and outlet of each engine's catalyst.

Testing was performed pursuant to Title 40, *Code of Federal Regulations*, Part 60, Appendix A (40 CFR §60 App. A), Methods 3A and 10.

The fieldwork was performed in accordance with EPA Reference Methods and DTE's Intent to Test¹, Test Plan Submittal. The following DTE personnel participated in the testing program: Mark Grigereit, Principal Engineer and Mr. Fred Meinecke, Senior Environmental Technician. Mr. Grigereit was the project leader. Mr. Reza Bagherian, USEPA, Region V was notified of the emissions testing. Mr. Robert Elmouchi with the Michigan Department of Environmental Quality observed the emissions testing.

2.0 SOURCE DESCRIPTION

The Columbus Compressor Station located at 1647 Caughill Road, Columbus, Michigan, employs the use of two (2) DeLaval, 4-cycle, lean burn, natural gas-fired 2,000 Horse Power reciprocating engines. The engines generate line pressure assisting in the transmission of natural gas throughout the pipeline transmission system in SE Michigan.

The emissions from Engines 1 & 2 are exhausted through a catalyst bed and to the atmosphere through individual exhaust stacks. The composition of the emissions from the engines depend both upon the speed of the engine and the torque delivered to the compressor. Ambient atmospheric conditions, as it affects the density of air, may limit the speed and torque at which the engines can effectively operate on a daily basis.

Schematic representations of each engine's exhaust and sampling locations are presented in Figure 1.

¹ MDEQ, Test Plan, Submitted August 30, 2016. (Attached-Appendix A)



Mr. Millingham Mr.

3.0 SAMPLING AND ANALYTICAL PROCEDURES

DTE Energy obtained emissions measurements in accordance with procedures specified in the USEPA *Standards of Performance for New Stationary Sources*. The sampling and analytical methods used in the testing program are indicated in the table below

| Sampling Method | Parameter | Analysis |
|-----------------|-----------------|------------------------------|
| USEPA Method 3A | Oxygen | Instrumental Analyzer Method |
| USEPA Method 10 | Carbon Monoxide | NDIR |

3.1 OXYGEN AND CARBON MONOXIDE (USEPA METHODS 3A AND 10)

3.1.1 Sampling Method

Oxygen (O_2) emissions were evaluated using USEPA Method 3A, "Gas Analysis for Carbon Dioxide, Oxygen, Excess Air, and Dry Molecular Weight (Instrumental Analyzer Method)". The O_2 analyzer utilizes a paramagnetic sensor.

Carbon monoxide (CO) emissions were evaluated using USEPA Method 10, "Determination of Carbon Monoxide Emissions from Stationary Sources". The CO analyzer utilizes a NDIR detector.

3.1.2 O₂ and CO Sampling Train

The EPA Methods 3A and 10 sampling system (Figure 2) consisted of the following components:

- (1) Stainless steel sampling probe.
- (2) Heated PTFE sampling line.
- (3) Sampling gas conditioner with particulate filter.
- (4) Flexible unheated PTFE sampling line.
- (5) Servomax 1400 O2/CO2 gas analyzer and TECO 48i NDIR CO gas analyzer.
- (6) USEPA Protocol 1 calibration gases.
- (7) Data Acquisition System.



3.1.3 Sampling Duration & Frequency

The emissions testing of the engine consisted of triplicate 15-minute samples at the inlet and exhaust of each catalyst. Sampling was conducted in a centroid position at each sampling location and was performed simultaneously for O_2 and CO. Data was recorded at 10-second intervals.

3.1.4 Quality Control and Assurance (O₂ and CO)

All sampling and analytical equipment was calibrated according to the guidelines referenced in Methods 3A and 7E. Calibration gases were EPA Protocol 1 gases and the concentrations were within the acceptable ranges (40-60% mid range and span) specified in Method 7E.

Calibration gas certification sheets are located in Appendix C.

3.1.5 Data Reduction

Data collected during the emissions testing was recorded at 10-second intervals and averaged in 1-minute increments. The CO emissions were recorded in parts per million (ppm). The 1-minute readings collected can be found in Appendix B.

Emissions calculations are based on calculations located in USEPA Methods 7E, 10, and 19 and can be found in Appendix E. The CO emissions data collected during the testing was calculated as grams per brake horsepower-hour (g/BHp-Hr).

4.0 OPERATING PARAMETERS

The test program included the collection of engine torque (%), engine speed (RPM), Horsepower (BHp), inlet and exhaust manifold air temperature (°F) suction and discharge pressure (psig), fuel upper heating value (BTU), and fuel flow (SCFH). Operational data is located in Appendix D.

5.0 DISCUSSION OF RESULTS

The results of the CO emission testing on Engines 1 & 2 are presented in Tables No. 1 and No. 2. The CO emissions are presented in grams per brake horsepower hour (g/Bhp-Hr), prior to and after the catalyst, and the Destruction Efficiency in percent (%). Process data presented includes the Unit load in percent (%), Engine Speed in revolutions per minute (RPM), Engine Torque in brake horsepower (Brake-hp), and Heat Input in million British Thermal Unit per hour (MMBtu/hr) for each test. The results of the testing indicate that Engines 1 & 2 are in compliance with permit requirements for CO of 93% Destruction Efficiency.



6.0 CERTIFICATION STATEMENT

"I certify that I believe the information provided in this document is true, accurate, and complete. Results of testing are based on the good faith application of sound professional judgment, using techniques, factors, or standards approved by the Local, State, or Federal Governing body, or generally accepted in the trade."

Mark Grigereit, QSTI

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TABLE NO. 1 CARBON MONOXIDE (CO) EMISSION TESTING RESULTS Engine 1 - Columbus Compressor Station September 28, 2016

| Test | | | | | | Oxygen ⁽¹⁾ | | CO | Destruction | | |
|---------|-------------|-------------|-----------------|--------------|--------------------------|-----------------------|---------------|---------------------------------------|---------------------|----------------------|-------------------|
| | Time | Load (%) | Speed (RPIM) | Brake-HP | Heat Input (MMBtu/Hr) | inlet (%) | Outlet (%) | Outlet (ppm @ 15% O ₂) | inlet (g/BHp-Hr) | Outlet (g/BHp-Hr) | Efficiency (%) |
| Run - 1 | 9:45-10:00 | 95.0 | 468.0 | 1,487 | 10.87 | 10.2 | 10.2 | 0.3 | 0.57 | 0.002 | 99.6 |
| Run - 2 | 10:07-10:22 | 95.0 | 471.5 | 1,503 | 10.97 | 10.0 | 10.0 | 0.7 | 0.54 | 0.005 | 99.1 |
| Run - 3 | 10:35-10:50 | <u>97.0</u> | <u>464.0</u> | <u>1,504</u> | <u>10.94</u> | <u>9.9</u> | <u>9,9</u> | <u>0.3</u> | 0.54 | <u>0.002</u> | <u>99.6</u> |
| | Avg: | 95.7 | 467.8 | 1,498 | 10.93 | 10.0 | 10.0 | 0.5 | 0.55 | 0.003 | 99.4 |

(1) Corrected for analyzer drift per USEPA method 7E

CO Permit Limits:

93% DE or 47 ppm @ 15% O2

DTE Energy[•]

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TABLE NO. 2 CARBON MONOXIDE (CO) EMISSION TESTING RESULTS Engine 2 - Columbus Compressor Station September 20, 2016

| Test | | Load (%) | Speed (RPIM) | Brake-HP | Heat Input (MMBtu/Hr) | Oxygen ^[1] | | CO Emissions ⁽¹⁾ | | | Destruction |
|---------|-------------|-------------|-----------------|--------------|--------------------------|-----------------------|---------------|---------------------------------------|---------------------|----------------------|-------------------|
| | Time | | | | | inlet (%) | Outlet (%) | Outlet (ppm @ 15% O ₂) | Inlet (g/BHp-Hr) | Outlet (g/BHp-Hr) | Efficiency (%) |
| Run - 1 | 11:45-12:00 | 77.5 | 451.5 | 1,166 | 9.47 | 12.2 | 12.3 | 0.1 | 0.98 | 0.001 | 99.9 |
| Run - 2 | 12:08-12:23 | 76.5 | 452.5 | 1,154 | 9.45 | 12.2 | 12.3 | 0.1 | 0.98 | 0.001 | 99.9 |
| | 12:32-12:47 | <u>74.5</u> | <u>450.5</u> | <u>1,119</u> | <u>9.37</u> | <u>12.2</u> | <u>12.3</u> | <u>0.2</u> | <u>0.99</u> | <u>0.002</u> | <u>99.8</u> |
| Run - 3 | | | | | | 12.2 | 12.3 | 0.1 | 0.98 | 0.001 | 99.9 |

(1) Corrected for analyzer drift per USEPA method 7E

CO Permit Limits:

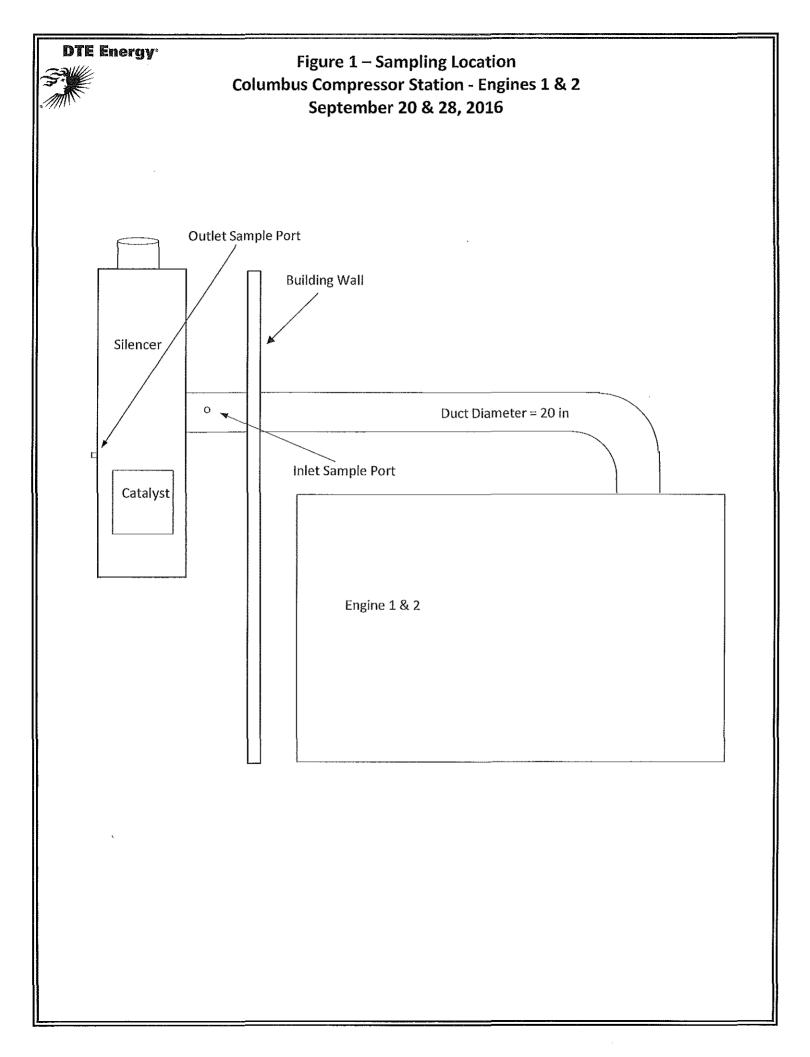
93% DE or 47 ppm @ 15% O₂

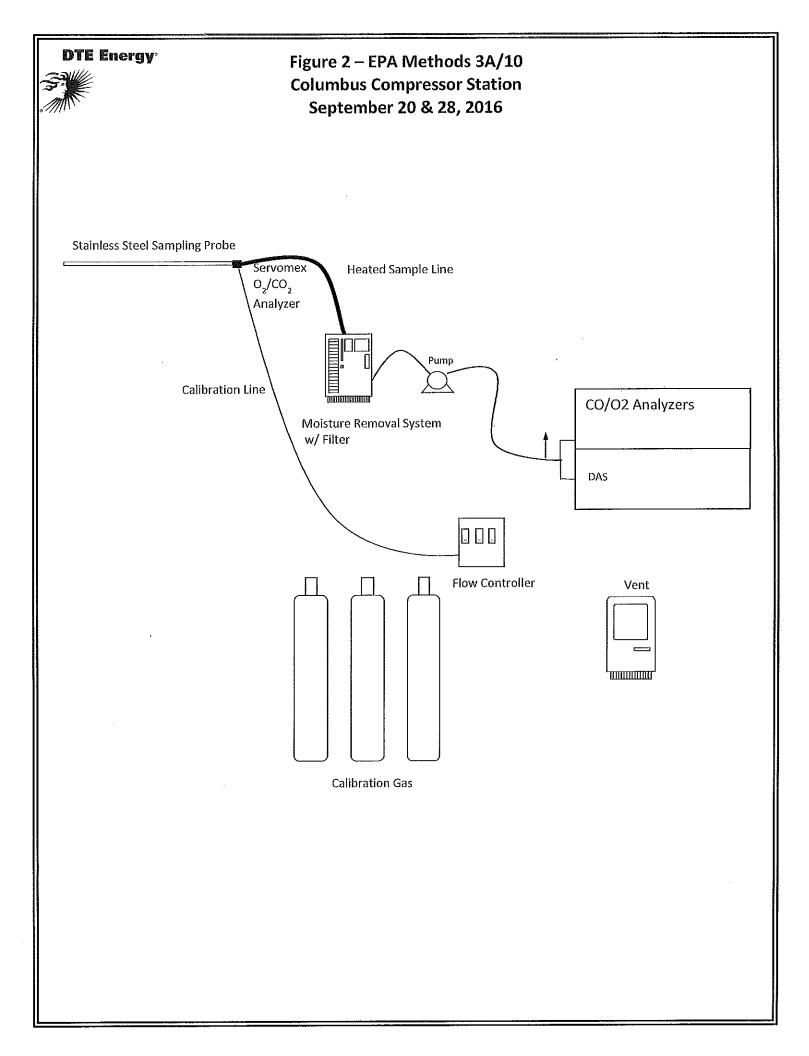




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FIGURES









APPENDIX A

MDEQ TEST PLAN