IMPACT COMPLIANCE & TESTING

Executive Summary

NSPS EMISSION TEST REPORT

EMISSION TEST RESULTS
FOR THE
NATURAL GAS FIRED ENGINE EMERGENCY GENERATOR SET
AT
UNIVERSITY OF MICHIGAN
ROSS SCHOOL OF BUSINESS (BLAU HALL)

University of Michigan contracted Impact Compliance & Testing (ICT) to perform compliance emission testing for nitrogen oxides (NOx), carbon monoxide (CO), and volatile organic compounds (VOC) from the Cummins Model GTA38 CC natural gas-fired reciprocating internal combustion engine (RICE) emergency electricity generator set located at Blau Hall, which is part of the Ross School of Business, 701 Tappan Avenue in Ann Arbor, Washtenaw County.

The Ross Blau Hall emergency generator set is required to be tested every 8,760 hours of operation (or at least every three years) in accordance with the provisions of 40 CFR Part 60 Subpart JJJJ, the New Source Performance Standard (NSPS) for spark ignition internal combustion engines.

The following table presents the emission test results from the November 14, 2019 test event.

Emission Unit	NO_x Concentration (ppmvd) †	CO Concentration (ppmvd) †	VOC Concentration (ppmvd) †
Ross Blau Hall Genset	23	299	2.5
Emission Standard	160	540	86

† Parts per million by volume, dry basis, corrected to 15% oxygen. VOC concentration is C_3 (propane).

The Ross Blau Hall emergency generator was tested while the unit operated within 10% of its maximum capacity and the measured pollutant concentrations are in compliance with the emission standards specified in 40 CFR 60.4233(e).

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NSPS EMISSION TEST REPORT

Title	NSPS EMISSION TEST REPORT FOR THE VERIFICATION OF AIR POLLUTANT EMISSIONS FROM A NATURAL GAS FIRED INTERNAL COMBUSTION ENGINE EMERGENCY GENERATOR SET
Report Date	January 8, 2020
Test Date	November 14, 2019

Facility Information	
Name	University of Michigan Ross School of Business
Street Address	Blau Hall 701 Tappan Avenue
City, County	Ann Arbor, Washtenaw
SRN	M0675

Testing Contractor	
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Project No.	190072

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FOR THE
VERIFICATION OF AIR POLLUTANT EMISSIONS
FROM A
NATURAL GAS FUELED INTERNAL COMBUSTION ENGINE
EMERGENCY GENERATOR SET

UNIVERSITY OF MICHIGAN
ROSS SCHOOL OF BUSINESS (BLAU HALL)

1.0 INTRODUCTION

University of Michigan (University) operates a natural gas fired, spark-ignition reciprocating internal combustion engine emergency generator set (SI-RICE genset) located at Blau Hall, which is part of the Ross School of Business, 701 Tappan Avenue in Ann Arbor, Washtenaw County.

The Ross SI-RICE genset has a horsepower rating of 803 HP and is subject to the SI-RICE New Source Performance Standard (NSPS) codified in 40 CFR Part 60 Subpart JJJJ. The SI-RICE NSPS specifies that:

1. *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.*

2. *If you are an owner or operator of a stationary SI internal combustion engine greater than 500 HP…you must conduct an initial performance test within 1 year of engine startup and conduct subsequent performance testing every 8,760 hours or 3 years, whichever comes first, thereafter to demonstrate compliance.*

The compliance testing was performed by Impact Compliance & Testing, Inc. (ICT) representatives Andy Rusnak and Blake Beddow on November 14, 2019.

The exhaust gas sampling and analysis was performed using procedures specified in the Test Plan that was reviewed and approved by the EGLE-AQD in its test plan approval letter dated July 15, 2019.

Questions regarding this emission test report should be directed to:

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Report Certification

This test report was prepared by Impact Compliance & Testing, Inc. based on field sampling data collected by ICT. Facility process data were collected and provided by the University of Michigan and Cummins representatives that were contracted by the University. This test report has been reviewed by University of Michigan representatives and approved for submittal to EGLE

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:

RL Harvey

Robert L. Harvey, P.E.
Services Director
Impact Compliance & Testing, Inc.

2.0 SOURCE AND SAMPLING LOCATION DESCRIPTION

2.1 General Process Description

The SI-RICE genset is classified as an emergency generator and is only operated to provide electricity to the Ross School of Business, Blau Hall building during power outages and for periodic maintenance testing.

2.2 Rated Capacities and Air Emission Controls

The Cummins Model GTA38 CC SI-RICE genset has a rated output of 803 horsepower (HP) and the connected generator has a rated electricity output of 500 kilowatts (kW). The engine is fueled exclusively with pipeline natural gas. It should be noted that the EGLE test plan approval letter specified the unit's power output as 770 HP, which is incorrect and is 803 HP.

The engine is equipped with a non-selective catalytic reduction (NSCR) system for passively controlling CO, NOx, and hydrocarbon (HC) emissions. The NSCR system consists of two catalyst beds that oxidize CO and HC using oxygen that is a component of the NOx. This system relies on a low concentration of oxygen at the catalyst bed inlet. The engine is equipped with controls to adjust the fuel-air-ratio at the engine intake manifold.

The NSCR is passive in nature and its efficiency is dependent on the proper exhaust gas temperature and oxygen content and catalyst bed condition. In accordance with 40 CFR 60.4243, the air-to-fuel ration controller is optimized for emissions reduction.

2.3 Sampling Locations

The RICE exhaust gas is released to the atmosphere through two (2) identical vertical exhaust stacks with vertical release points.

Prior to the test event, vertical exhaust stack extensions were installed by ICT personnel to provide sampling locations that meet USEPA Method 1 criteria. Each stack extension has an inner diameter of 8 inches and was equipped with two (2) sample ports, opposed 90°, that provide a sampling location 14.3 inches (1.8 duct diameters) upstream and 44.0 inches (5.5 duct diameters) downstream from any flow disturbance. The stack extensions were removed following the test event.

Appendix 1 provides diagrams of the emission test sampling locations.

3.0 SUMMARY OF TEST RESULTS AND OPERATING CONDITIONS

3.1 Purpose and Objective of the Tests

The provisions of 40 CFR Part 60 Subpart JJJJ require the University to test the Ross SI-RICE for carbon monoxide (CO), nitrogen oxides (NOx), and volatile organic compounds (VOC) emissions every 8,760 hours of operation or 3 years, whichever comes first.

The unit was previously tested on September 30, 2016 and testing was originally scheduled to occur in August 2019 to satisfy the three-year requirement. However, upon startup of the engine, the ignition backfired causing a failure of the engine and catalyst. University of Michigan requested, and received from EGLE, a 45-day extension to make necessary repairs and reschedule the test event. The emission test event was performed within the approved 45-day extension period.

Measurements were performed for the RICE exhaust to determine CO, NO_X, and VOC (as non-methane hydrocarbons, NMHC) concentrations and diluent gas content (oxygen and carbon dioxide).

The Cummins Model GTA38 CC SI-RICE genset at Blau Hall is not currently identified in Renewable Operating Permit (ROP) No. MI-ROP-M0675-2014a issued to the University. The emergency generator at Blau Hall is included as part of the recent ROP renewal application and presumably will be added to Flexible Group FG-EMERG-JJJJ.

3.2 Operating Conditions During the Compliance Tests

The testing was performed while the SI-RICE genset was operated within 10% of its maximum rated capacity of 500 kW electricity output. Cummins representatives (hired by the University) provided kW output data at 15-minute intervals for each test period. The SI-RICE genset kW output was 497 kW during the test periods (99% of maximum capacity) and used 7,018 cubic feet per hour (cfh) of natural gas.

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

3.3 Summary of Air Pollutant Sampling Results

The gases exhausted from the SI-RICE genset were sampled for three (3) one-hour test periods during the compliance testing performed November 14, 2019. Since the Ross SI-RICE has two (2) exhaust stacks, gases exhausted from each stack were sampled for 30 minutes during each one-hour test.

Table 3.1 presents the average measured CO, NO_X, and VOC emission rates for the engine (average of the three test periods for the engine) and applicable emission limits.

The measured pollutant concentrations are less than (in compliance with) the emission standards specified in 40 CFR Part 60 Subpart JJJJ. Test results for each one-hour sampling period are presented in Section 6.0 of this report.

Table 3.1 Average measured air pollutant concentrations for the Ross School of Business, Blau Hall SI-RICE genset (three-test average)

Emission Unit	NOx Concentration (ppmvd)†	CO Concentration (ppmvd)†	VOC Concentration (ppmvd)†
Ross Blau Hall Genset	23	299	2.5
Emission Standard	160	540	86

† Parts per million by volume, dry basis, corrected to 15% oxygen. VOC concentration is C_3 (propane).

4.0 SAMPLING AND ANALYTICAL PROCEDURES

A protocol for the air emission testing was reviewed and approved by the EGLE-AQD. 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 and CO_2 content was determined using 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 NOx concentration was determined using a chemiluminescence instrumental analyzer.
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 an internal methane separation GC column.

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

CO_2 and O_2 content in the RICE exhaust gas stream was measured continuously throughout each test period in accordance with USEPA Method 3A. The exhaust gas CO_2 content was monitored using a Servomex 1440D single beam single wavelength (SBSW) infrared gas analyzer. The exhaust gas O_2 content was monitored using a paramagnetic sensor within the Servomex 1440D gas analyzer.

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_2 and CO_2 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.

4.3 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 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.

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 TEI Model 48i infrared CO analyzer.

Throughout each test period, a continuous sample of the engine exhaust gas was extracted from the stack using the heated sample line and gas conditioning system described previously in this section. 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.

4.5 VOC Concentration Measurements (USEPA Methods 25A and ALT-096)

The VOC emission rate was determined by measuring the nonmethane hydrocarbon (NMHC) concentration in the engine exhaust gas. NMHC pollutant concentration was determined using a TEI Model 55i Methane / Nonmethane hydrocarbon analyzer. The TEI 55i analyzer contains an internal gas chromatograph column that separates methane from non-methane components. 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.

The USEPA Office of Air Quality Planning and Standards (OAQPS) has issued several alternate test methods approving the use of the TEI 55-series analyzer as an effective instrument for measuring NMOC from gas-fueled reciprocating internal combustion engines (RICE) in that it uses USEPA Method 25A and 18 (ALT-066, ALT-078 and ALT-096).

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 NHMC analyzer was not conditioned to remove moisture. Therefore, VOC measurements correspond to standard conditions with no moisture correction (wet basis).

Prior to, and at the conclusion of each test, the instrument was calibrated using mid-range calibration (propane) and zero gas to determine analyzer calibration error and system bias.

Appendix 3 provides field data sheets.

Appendix 4 provides air pollutant calculations.

Appendix 5 provides one-minute instrument response data for the CO, NOx and NMHC analyzers.

5.0 QA/QC ACTIVITIES

5.1 NO_x Converter Efficiency Test

The NO_2 – NO conversion efficiency of the Model 42c analyzer was verified prior to the testing program. A USEPA Protocol 1 certified concentration of NO_2 was injected directly into the analyzer, following the initial three-point calibration, to verify the analyzer's conversion efficiency. The analyzer's NO_2 – NO converter uses a catalyst at high temperatures to convert the NO_2 to NO for measurement. The conversion efficiency of the analyzer is deemed acceptable if the measured NO_X concentration is greater than or equal to 90% of the expected value.

The NO_2 – NO conversion efficiency test satisfied the USEPA Method 7E criteria (measured NO_X concentration was greater than 90% of the expected value as required by Method 7E).

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.

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 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.

5.4 Instrumental Analyzer Interference Check

The instrumental analyzers used to measure NO_X, CO, O_2, and CO_2 have had an interference response test preformed 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 2.5% 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 the test day, initial three-point instrument calibrations were performed for the NO_x, CO, CO_2, and O_2 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 the 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_2, O_2, 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 Meter Box Calibrations

The dry gas meter and sampling 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 Nutech metering consoles were calibrated using a NIST traceable Omega® Model CL 23A temperature calibrator.

5.7 Determination of Exhaust Gas Stratification

A stratification test was performed for the RICE exhaust stacks. 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 each RICE exhaust stack indicate that the measured O_2 and CO_2 concentrations did not vary by more than 0.3% from 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.

Appendix 6 presents test equipment quality assurance data (NO_2 – NO conversion efficiency test data, instrument calibration and system bias check records, calibration gas and gas divider certifications, and meter box 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 Table 6.1.

For each test period, each exhaust stack was sampled for 30 minutes and used to calculate a one hour average. Data collected while the sampling port was moved between stacks was removed from the data set. The measured average air pollutant concentrations for the Ross SI-RICE emergency genset are less than the allowable limits specified in 40 CFR Part 60 Subpart JJJJ for the engine:

- 540 parts per million by volume, dry basis, corrected to 15% oxygen (ppmvd @ 15% O_2) for CO;
- 160 ppmvd @ 15% O_2 for NO_x; and
- 86 ppmvd @ 15% O_2 for VOC.

6.2 Variations from Normal Sampling Procedures or Operating Conditions

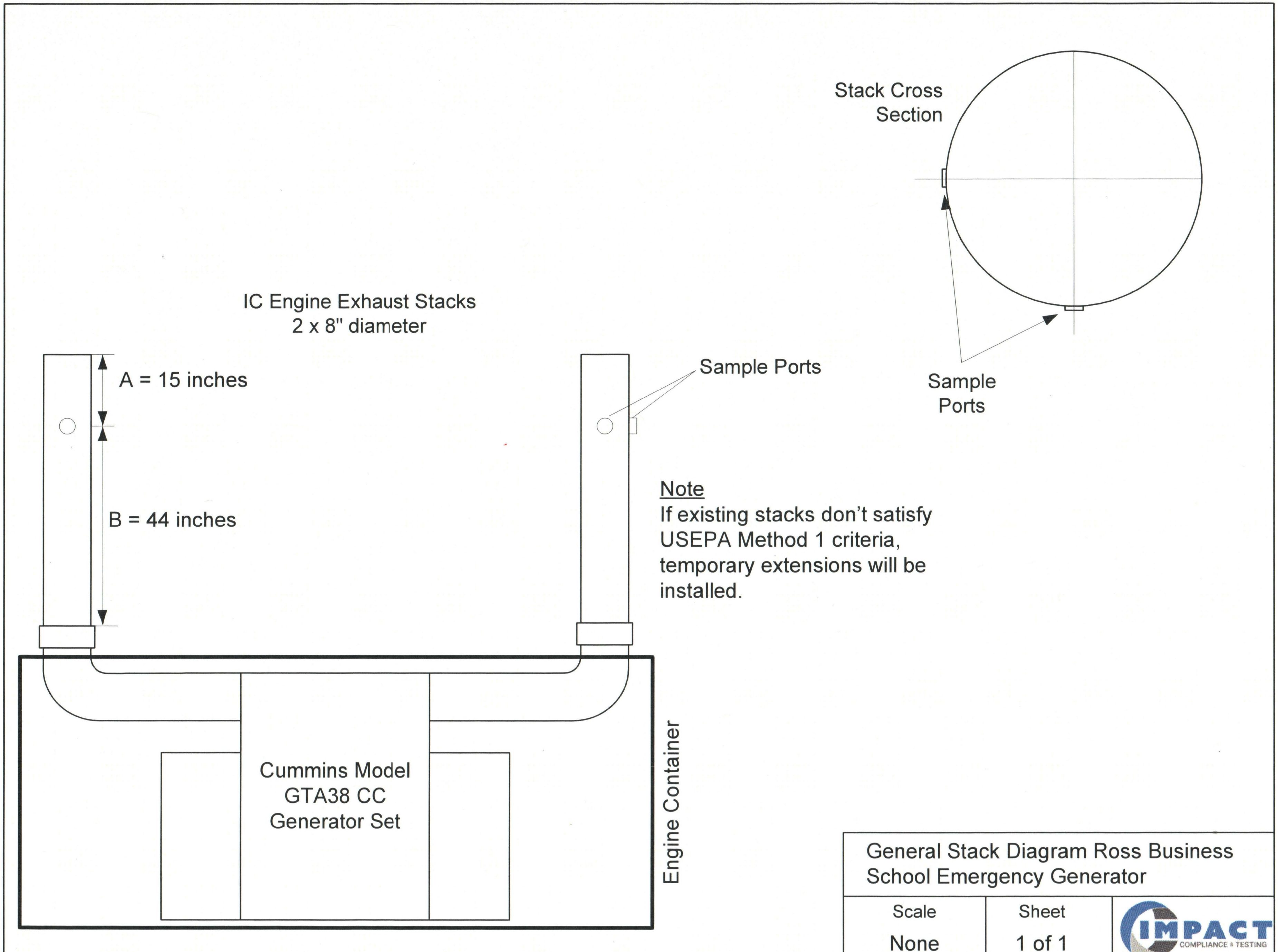
The testing for all pollutants was performed in accordance with USEPA methods and the approved test protocol. The engine-generator set was operated within 10% of maximum output (500 kW generator output) and no variations from normal operating conditions occurred during the engine test periods.

Table 6.1 Measured exhaust gas conditions and NO_x, CO, and VOC air pollutant concentrations for the Ross School of Business, Blau Hall SI-RICE genset

Test No. Test date Test period (24-hr clock)	1 11/14/2019 1028-1133	2 11/14/2019 1242-1348	3 11/14/2019 1443-1550	Three Test Average
Generator output (kW)	497	497	497	497
Natural gas consumption (cfh)	7,018	7,018	7,018	7,018
Exhaust Gas Composition				
O_2 content (% vol)	0.0	0.0	2.0	0.7
Moisture (% vol)	18	16	20	18
Nitrogen Oxides				
NO_X conc. (ppmvd)	129	54	57	80
NO_X conc. at 15% O_2 (ppmvd)	36	15	18	23
NO_X emission standard	-	-	-	160
Carbon Monoxide				
CO conc. (ppmvd)	1038	1094	941	1024
CO conc. at 15% O_2 (ppmvd)	293	309	294	299
CO emission standard	-	-	-	540
Volatile Organic Compounds				
VOC conc. (ppmv C_3)	6.2	6.7	7.6	6.8
VOC conc. at 15% O_2 (ppmvd)	2.2	2.3	2.9	2.5
VOC emission standard	-	-	-	86

APPENDIX 1

- IC Engine Sample Port Diagram


Stack Cross Section
Sample Ports
IC Engine Exhaust Stacks
2 x 8" diameter
A = 15 inches
B = 44 inches
Sample Ports
Note
If existing stacks don't satisfy USEPA Method 1 criteria, temporary extensions will be installed.
Cummins Model GTA38 CC Generator Set
Engine Container
General Stack Diagram Ross Business School Emergency Generator
Scale
None
Sheet
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