# **COMPLIANCE TEST REPORT** Wakefield Compressor Station (CS7) **EU-UNIT701 (Unit 701)**

Prepared for:



TransCanada Great Lakes Gas Transmission Lp Wakefield, MI Permit MI-ROP-N2168-2016 State Registration No. N2168

Prepared by:



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## PREFACE

I, Karl Mast, do hereby certify that the source emissions testing conducted at TransCanada in Wakefield, MI was performed in accordance with the procedures set forth by the United States Environmental Protection Agency, and that the data and results submitted within this report are an exact representation of the testing.

Mast

Karl Mast Test Supervisor

I, Karl Mast, do hereby attest that all work on this project was performed under my direct supervision, and that this report accurately and authentically presents the source emissions testing conducted at TransCanada Great Lakes Gas Transmission LP's Wakefield Compressor Station in Wakefield, MI.

Karl Mast Test Supervisor

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## SUMMARY

The compliance emissions testing program was performed on Unit 701 to comply with the established NOx standards pursuant to testing requirements specified in Permit MI-ROP-N2168-2016, R 336.1201(3), 40 CFR 60, Subpart GG, 40 CFR 60.332, and 40 CFR 60.335. A summary of the test results is given below:

|                                   |           | EU-UNIT701    |                               |          |
|-----------------------------------|-----------|---------------|-------------------------------|----------|
| Parameter                         | High Load | Mid-High Load | Mid-Low Load                  | Low Load |
| NOx ppmvd<br>@ 15% O <sub>2</sub> | 139.60    | 114.07        | 104.25                        | 89.57    |
| NOx lb/hr                         | 98.56     | 66.64         | 54.17                         | 37.83    |
| Limit                             |           | :             | nvd@15% O2<br>and<br>23 lb/hr |          |

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#### **1. INTRODUCTION**

This report presents the results of the source emissions testing conducted by Environmental Quality Management, Inc. (EQM) for TransCanada's Great Lakes Gas Transmissions LP's (GLGT) Wakefield Compressor Station, near Wakefield, MI, which is located in Gogebic County. The primary purpose of this testing program was to conduct emissions testing to determine compliance with operating permit No. MI-ROP-N2168-2016, (R 336.1201(3)), 40 CFR 60, Subpart GG, 40 CFR 60.332, and 40 CFR 60.335 for the on Unit 701 at GLGT 's gas compressor facility.

To ensure that compliance with the emission limits is maintained, the Air Compliance Team of TransCanada's GLGT (GLGT) contracted Environmental Quality Management, Inc. (EQM) to perform source emissions testing on Unit 701. The primary purpose of this testing program was to conduct emissions testing to determine compliance with permit No. MI-ROP-N2168-2016 at GLGT's gas compressor facility.

EQM's responsibility was to conduct the compliance testing for the NO<sub>x</sub>, CO, and O<sub>2</sub> emission rates and perform data reduction for conformance evaluation. GLGT's responsibility was to maintain process operating parameters and to assist in providing process operating data per compliance test requirements.

The following report provides information pertaining to TransCanada's process operations, and Compliance testing. The Compliance testing conducted on Unit 701 was performed on December 18, 2018 from 10:33 A.M. to 5:12 P.M.

The following requirements were specific for the testing program:

- 1. Equipment calibrations performed and calibration data provided.
- 2. Twelve (12) twemty (20) -minute, minimum, CO, O<sub>2</sub>, and NOx test runs performed at the Unit 701 pursuant to EPA, Title 40, Code of Federal Regulations, Part 60 (40 CFR 60), Appendix A and Subpart GG.
- 3. Process manufacturing operations maintained at 4 evenly spaced loads and production and fuel consumption rates recorded during the emissions testing periods.
- 4. All testing and analyses performed in accordance with current EPA test methodologies and analytical procedures for O<sub>2</sub>, CO, and NO<sub>x</sub>, emissions determinations.

5. Stratification was found to be less than 5% in the turbine exhaust.

The testing program was approved by and/or coordinated with Shawn Flannigan, TransCanada's GLGT, LP. The emission testing was managed by Karl Mast, Manager Air Emissions, EQM and performed by Zach Hill, Team Leader, EQM and Emily Woerpel, Test Technician, EQM. The emission testing was observed by Jeremy Howe, MDEQ.

## 2. TEST RESULTS SUMMARY

The compliance testing was performed on Unit 701 system in accordance with the requirements of the Code of Federal Regulations, Title 40, Part 60, Appendix A and Subpart GG. A summary of the test results is given below:

|                                   |           | EU-UNIT701    |                               |          |
|-----------------------------------|-----------|---------------|-------------------------------|----------|
| Parameter                         | High Load | Mid-High Load | Mid-Low Load                  | Low Load |
| NOx ppmvd<br>@ 15% O <sub>2</sub> | 139.60    | 114.07        | 104.25                        | 89.57    |
| NOx lb/hr                         | 98.56     | 66.64         | 54.17                         | 37.83    |
| Limit                             |           | ;             | nvd@15% O2<br>and<br>23 lb/hr |          |

 Table 1. NOx Test Results Summary - Unit 701

Based on the information provided above, the Unit 701 met the acceptance criteria during the course of the testing. A complete list of performance parameters for each test run that was performed at the stack sampling locations can be found in Table 2-11.

| Run                                   | 1        | 2        | 3        |          |
|---------------------------------------|----------|----------|----------|----------|
| Date                                  | 12/18/18 | 12/18/18 | 12/18/18 |          |
| Time                                  | 10:33    | 10:56    | 11:17    |          |
| Engine Operating Conditions           | High     | High     | Hìgh     | Awrages  |
| Unit Horsepower from Control Panel    | 17,831.1 | 18,263.7 | 17,918.6 | 18,004.5 |
| % Load                                | 57.5     | 58.9     | 57.8     | 58.1     |
| Unit Speed (rpm) CT/GG/GP/Jet         | 5,004.0  | 5,010.0  | 5,015.0  | 5,009.7  |
| % CT Speed                            | 30.4     | 30.5     | 30.5     | 30.5     |
| Gas Compressor Speed (rpm) PT/Booster | 8,837.3  | 8,840.0  | 8,840.0  | 8,839.1  |
| % CT Speed                            | 120.2    | 120.3    | 120.3    | 120.3    |
| Compressor Suction Pressure (PSIG)    | 610.4    | 603.7    | 600.7    | 604.9    |
| Compressor Suction Temperature (°F)   | 38.8     | 39.3     | 39.6     | 39.2     |
| Compressor Discharge Pressure (PSIG)  | 820.9    | 835.4    | 842.6    | 833.0    |
| Compressor Discharge Temperature (°F) | 82.4     | 86.8     | 89.2     | 86.2     |
| Compressor Flow (MMSCF/D)             | 1248.5   | 1153.4   | 1116.0   | 1,172.6  |
| % Torque                              | 189.1    | 193.4    | 189.6    | 190.7    |
| Heat Rate (BTU/HP-hr)                 | 9,739.2  | 9,477.6  | 9,654.9  | 9,623.9  |
| Ambient Conditions                    |          |          |          | · · · ·  |
| Ambient Temperature (°F)              | 28.00    | 28.00    | 34.00    | 30.00    |
| Barometric Pressure (psi)             | 13.81    | 13.81    | 13.79    | 13.80    |
| Ambient Relative Humidity (%)         | 60.00    | 60.00    | 56.00    | 58.67    |
| Absolute Humidity (grains/LB)         | 29.31    | 29.31    | 34.97    | 31.20    |

# Table 2. Engine Operating & Ambient Conditions-Unit 701 High Load

| Date   | 12/18/18            | 12/18/18            | 7                  | •        |
|--|---------------------|---------------------|--------------------|----------|
| Time   |                     | 12/10/10            | 12/18/18           |          |
|  | 10:33               | 10:56               | 11:17              |          |
| Emissions Concentrations & Calculated Mass Emissions   | High                | High                | High               | Averages |
| NO <sub>x</sub> ppm (BIAS Corrected)   | 129,46              | 128.79              | 128.85             | 129.03   |
| NO <sub>X</sub> g/BHP-HR   | 2.53                | 2.44                | 2.48               | 2,48     |
| NO <sub>X</sub> LB/HR  | 99.54               | 98.16               | 97.97              | 98.56    |
| NO <sub>X</sub> (ppm @ 15% O <sub>2</sub> )  | 140.67              | 139.17              | 138.98             | 139.60   |
| NO <sub>X</sub> (ppm @ 15% O <sub>2</sub> , ISO)   | 218.26              | 215,94              | 215.08             | 216.42   |
| NOx LB/MMBTU   | 0.52                | 0.51                | 0.51               |          |
| CO ppm (raw measured dry)  | 14.62               | ···                 | P                  | 0.51     |
| CO ppm (BIAS Corrected)  |                     | 12.19               | 12.19              | 13.00    |
| CO g/BHP-HR  | 14.62               | 12.19               | 12.19              | 13.00    |
| CO LB/HR   | 0.17                | 0.14                | 0.14               | 0.15     |
|  | 6.84                | 5.66                | 5,64               | 6.05     |
| CO LB/MMBTU **   | 0.04                | 0.03                | 0.03               | 0.03     |
| CO (ppm @ 15% O <sub>2</sub> )   | 15.89               | 13.17               | 13.15              | 14.07    |
| CO (ppm @ 15% O <sub>2</sub> , ISO)  | 24.65               | 20,44               | 20.35              | 21.81    |
| % O <sub>2</sub> (raw measured dry)  | 15.47               | 15.44               | 15.43              | 15.45    |
| % O2 (BIAS Corrected)  | 15,47               | 15.44               | 15.43              | 15.45    |
| Calculated Emissions Concentrations  |                     |                     |                    |          |
| % CO <sub>2</sub> (Wet) *  | 2.89                | 2.90                | 2,91               | 2.90     |
| %CO <sub>2</sub> (Dry) *   | 3.09                | 3.10                | 3,11               | 3.10     |
| % H <sub>2</sub> O *   | 6.33                | 6.35                | 6,47               | 6.38     |
| % O <sub>2</sub> (Wet) *   | 14.49               | 14,46               | 14.43              | 14.46    |
| % N <sub>2</sub> + CO (Wet) *  | 76.29               | 76.28               | 76.19              | 76,25    |
| Calculated Flows   |                     | 1 /0.20             |                    | 10,23    |
| Fuel Flow - (SCFM)   | 3122.33             | 3112,17             | 1                  | 3115.00  |
| Fuel Flow - (SCFII)  | 187,340             | 186,730             | 3110.50<br>186,630 | 186,900  |
| Puel Flow (LB/HR)  | 5,984.0             | 5,966.8             | 5,954,0            | 5,968    |
| Exhaust Flow (LB/HR)   | 419,280.9           | 415,763.4           | 413,040.3          | 416,028  |
| Exhaust Flow (WSCFM)   | 109,777.5           | 108,894.0           | 108,661.7          | 109,111  |
| Air Flow (WSCFM)<br>xhaust Flow Method 19 (wsefm)  | 103,115             | 102,220             | 101,980            | 102,438  |
|  | 107,111             | 106,176             | 105,925            | 106,404  |
| xhaust Flow Method 19 (lbm/min)  | 4,776               | 4,734               | 4,725              | 4,745    |
| xhaust Flow Carbon Balance (Ibm/min)<br>ir flow Beshouri (sefin)                             | 8,226.07            | 8,155.96            | 8,137.26           | 8,173    |
| BSAC, #/BIIP-hr  | 107,029.07<br>26.36 | 106,116.87<br>25.51 | 105,873.61         | 106,340  |
| uel Flow Measurements  | 20.30               | 43.51               | 25.94              | 26       |
| uel Flow From Screen(MSCFH)  |                     | 10( 73              | 196.62             | 104.00   |
| ucl Flow (SCFII) From Fuel Orifice   | 187.34              | 186.73              | 186.63             | 186.90   |
|  | 134,570             | 134,184             | 133,894            | 134,216  |
| uel Gas Differential Pressure ("H2O)<br>uel Gas Static Pressure (PSIG)                       | 119.82              | 120.78              | 121.05             | 121      |
|  | 349.09              | 348.55              | 348.28             | 349      |
| uel Gas Temperature (°F)   | 50.71               | 55.87               | 58,32              | 55       |
| ** BASED ON FUEL SPECIFIC DRY F-FACTOR CALCULATION<br>BASED ON CARBON BALANCE (STOICH. + 02) | Run 1               | Run 2               | Run 3              |          |

| Run                                   | 10       | 11       | 12       |          |
|---------------------------------------|----------|----------|----------|----------|
| Date                                  | 12/18/18 | 12/18/18 | 12/18/18 |          |
| Time                                  | 16:10    | 16:31    | 16:52    |          |
| Engine Operating Conditions           | Mid High | Mid High | MidHigh  | Awrages  |
| Unit Horsepower from Control Panel    | 13,742.3 | 13,279.8 | 14,839.8 | 13,954.0 |
| % Load                                | 44.3     | 42.8     | 47.9     | 45.0     |
| Unit Speed (rpm) CT/GG/GP/Jet         | 4,599.0  | 4,550.0  | 4,728.0  | 4,625.7  |
| % CT Speed                            | 28.0     | 27.7     | 28.7     | 28.1     |
| Gas Compressor Speed (rpm) PT/Booster | 8,638.6  | 8,592.9  | 8,697.6  | 8,643.0  |
| % CT Speed                            | 117.5    | 116.9    | 118.3    | 117.6    |
| Compressor Suction Pressure (PSIG)    | 620      | 619      | 612.2    | 617.2    |
| Compressor Suction Temperature (°F)   | 40       | 41       | 40.4     | 40.5     |
| Compressor Discharge Pressure (PSIG)  | 836      | 837      | 842.6    | 838.4    |
| Compressor Discharge Temperature (°F) | 84       | 85       | 87.0     | 85.2     |
| Compressor Flow (MMSCF/D)             | 976      | 924      | 987.3    | 962.5    |
| % Torque                              | 158.6    | 154.9    | 166.6    | 160.0    |
| Heat Rate (BTU/HP-hr)                 | 10,338.8 | 10,340.8 | 10,128.9 | 10,269.5 |
| Ambient Conditions                    |          | · · ·    |          |          |
| Ambient Temperature (°F)              | 39.0     | 39.0     | 38.00    | 38.67    |
| Barometric Pressure (psi)             | 13.78    | 13.78    | 13.78    | 13.78    |
| Ambient Relative Humidity (%)         | 62.0     | 62.0     | 62.00    | 62.00    |
| Absolute Humidity (grains/LB)         | 47.33    | 47.33    | 45.50    | 46.72    |

# Table 4. Engine Operating & Ambient Conditions -Unit 701 Mid-High Load

| Run  | 10          | 11                                    | 12        | 1                                     |
|--|-------------|---------------------------------------|-----------|---------------------------------------|
| Date   | 12/18/18    | 12/18/18                              | 12/18/18  |                                       |
| Time   | 16:10       | 16:31                                 | 16:52     |                                       |
| Emissions Concentrations & Calculated Mass Emissions                 | Mid High    | Mid High                              | Mid High  | Averages                              |
| NO <sub>x</sub> ppm (BIAS Corrected)                                 | 92.95       | 95.65                                 | 103.30    | 97.30                                 |
| NO <sub>X</sub> g/BIIP-HR  | 2.13        | 2.15                                  | 2,22      | 2.16                                  |
| NO <sub>X</sub> LB/HR  | 64,40       | 63.03                                 | 72.48     | 66.64                                 |
| NO <sub>X</sub> (ppm @ 15% O <sub>2</sub> )                          | 111.24      | 112.64                                | 118.34    | r                                     |
| NO <sub>x</sub> (ppm @ 15% O <sub>1</sub> , ISO)                     | 175.36      |                                       |           | 114.07                                |
| NOx LB/MMBTU   |             | 177.57                                | 185.64    | 179.52                                |
| CO ppm (raw measured dry)  | 0.41        | 0.41                                  | 0.44      | 0.42                                  |
|  | 20.14       | 20.21                                 | 18,21     | 19.52                                 |
| CO g/BIIP-HR   | 0.28        | 0,28                                  | 0.24      | 0.27                                  |
| CO LB/IIR  | 8.49        | 8.11                                  | 7.78      | 8.13                                  |
| CO LB/MMBTU **   | 0.05        | 0.05                                  | 0.05      | 0.05                                  |
| CO (ppm @ 15% O <sub>2</sub> )                                       | 24,10       | 23.80                                 | 20.86     | 22,92                                 |
| CO (ppm @ 15% O <sub>2</sub> , ISO)                                  | 38.00       | 37.52                                 | 32.83     | 36.11                                 |
| % O2 (BIAS Corrected)  | 15.97       | 15.89                                 | 15.75     | 15.87                                 |
| Calculated Emissions Concentrations                                  | · · · · · · | Den das te                            |           |                                       |
| % CO <sub>2</sub> (Wet) *  | 2.65        | 2.68                                  | 2,75      | 2,69                                  |
| %CO2 (Dry) *   | 2.82        | 2.86                                  | 2.94      | 2.87                                  |
| % ll <sub>2</sub> O *  | 6.22        | 6.29                                  | 6.39      | 6.30                                  |
| % O <sub>2</sub> (Wet) *   | 14.98       | 14.89                                 | 14.74     | 14.87                                 |
| % N <sub>2</sub> + CO (Wet) *  | 76.16       | 76.13                                 | 76.12     | 76.14                                 |
| Calculated Flows   | the second  | i e estas                             |           | · · · · · · · · · · · · · · · · · · · |
| Fuel Flow - (SCFM)   | 2554.50     | 2469,00                               | 2702.50   | 2575.33                               |
| Fuel Flow - (SCFH)   | 153,270     | 148,140                               | 162,150   | 154,520                               |
| Fuel Flow (LB/HR)  | 4,897.4     | 4,731.3                               | 5,181.1   | 4,937                                 |
| Exhaust Flow (LB/HR)   | 372,704.8   | 354,876.8                             | 378,934.2 | 368,839                               |
| Exhaust Flow (WSCFM)   | 97,775.1    | 93,169.1                              | 99,534,2  | 96,826                                |
| Ait Flow (WSCFM)   | 92,829      | 88,304                                | 94,054    | 91,729                                |
| Exhaust Flow Method 19 (wscfm)                                       | 96,519      | 91,799                                | 97,749    | 95,356                                |
| Exhaust Flow Method 19 (Ibm/min)                                     | 4,310       | 4,099                                 | 4,364     | 4,257                                 |
| Exhaust Flow Carbon Bahnee (Ibm/min)                                 | 7,385.81    | 7,028.78                              | 7,492.04  | 7,302                                 |
| Air flow Beshouri (scfm)   | 96,096.53   | 91,451.23 ·                           | 97,478.70 | 95,009                                |
| BSAC, #/BHP-hr Fuel Flow Measurements                                | 30.79       | 30,31                                 | 28.89     | 30                                    |
| Fuel Flow From Screen(MSCFH)   |             |                                       |           | ·                                     |
|  | 153.27      | 148.14                                | 162,15    | 154.52                                |
| Fuel Flow (SCFH) From Fuel Orifice                                   | 110,135     | 106,399                               | 116,514   | 111,016                               |
| Fuel Gas Differential Pressure ("H2O)                                | 80.72       | 75.51                                 | 91,03     | 82                                    |
| Fuel Gas Static Pressure (PSIG)                                      | 350.43      | 350.7                                 | 349.62    | 350                                   |
| Fuel Gas Temperature (°F)  | 54.22       | 55.46                                 | 56.59     | 55                                    |
| ** BASED ON FUEL SPECIFIC DRY F-FACTOR CALCULATION                   | Run 10      | Run 11                                | Run 12    |                                       |
| * BASED ON CARBON BALANCE (STOICH. + O2)<br>- A/FIS TOTAL MASS RATIO |             | · · · · · · · · · · · · · · · · · · · |           |                                       |

# Table 5. Emissions Concentrations/Calculated Emissions, & Flow Data –Unit 701Mid-High Load

# Table 6. Engine Operating & Ambient Conditions - Unit 701 Mid-Low Load

| Run                                   | 7        | 8        | 9        |          |
|---------------------------------------|----------|----------|----------|----------|
| Date                                  | 12/18/18 | 12/18/18 | 12/18/18 |          |
| Time                                  | 14:47    | 15:08    | 15:29    |          |
| Engine Operating Conditions           | Mîd Low  | Mid Low  | Mid Low  | Averages |
| Unit Horsepower from Control Panel    | 11,326.0 | 12,024.0 | 12,264.6 | 11,871.5 |
| % Load                                | 36.5     | 38.8     | 39.6     | 38.3     |
| Unit Speed (rpm) CT/GG/GP/Jet         | 4,258.0  | 4,383.0  | 4,448.0  | 4,363.0  |
| % CT Speed                            | 25.9     | 26.6     | 27.0     | 26.5     |
| Gas Compressor Speed (rpm) PT/Booster | 8,493.6  | 8,536.5  | 8,584.9  | 8,538.3  |
| % Cf Speed                            | 115.6    | 116.1    | 116.8    | 116.2    |
| Compressor Suction Pressure (PSIG)    | 637.5    | 631.6    | 629      | 632.8    |
| Compressor Suction Temperature (°F)   | 40.7     | 40.6     | 41       | 40.6     |
| Compressor Discharge Pressure (PSIG)  | 822.0    | 826.5    | 828      | 825,5    |
| Compressor Discharge Temperature (°F) | 77.4     | 79.5     | 80       | 79.0     |
| Compressor Flow (MMSCF/D)             | 927.9    | 953.8    | 969      | 950.1    |
| % Torque                              | 141.1    | 145.6    | 146.3    | 144.3    |
| Heat Rate (BTU/HP-hr)                 | 10,681.7 | 10,686.8 | 10,847.5 | 10,738.7 |
| Ambient Conditions                    |          |          |          |          |
| Ambient Temperature (°F)              | 39.00    | 39.00    | 39.0     | 39.00    |
| Barometric Pressure (psi)             | 13.77    | 13.77    | 13.77    | 13.77    |
| Ambient Relative Humidity (%)         | 59.00    | 64.00    | 59.0     | 60.67    |
| Absolute Humidity (grains/LB)         | 45.05    | 48.91    | 45.05    | 46.34    |

# TransCanada's GLGT LP 050614.0082 Compliance Test Report

| Table 7. Emissions Concentrations/Calculated Emissions, & Flow Data – |
|---|
| Unit 701 Mid-Low Load   |

| Run  | 7                  | 8                  | 9                  | ]                   |
|--|--------------------|--------------------|--------------------|---------------------|
| Date   | 12/18/18           | 12/18/18           | 12/18/18           |                     |
| Time   | 14:47              | 15:08              | 15:29              |                     |
| Emissions Concentrations & Calculated Mass Emissions                   | Mid Low            | Mid Low            | Mid Low            | Averages            |
| NO <sub>x</sub> ppm (BIAS Corrected)                                   | 80.50              | 81.22              | 83.89              | 81.87               |
| NO <sub>X</sub> g/BIIP-IIR   | 2.05               | 2.04               | 2.12               | 2.07                |
| NO <sub>X</sub> LB/IIR   | 51,23              | 54.08              | 57.21              | 54.17               |
| NO <sub>X</sub> (ppm @ 15% O <sub>2</sub> )                            | 103.93             | 103.28             | 105,53             | 104.25              |
| NO <sub>X</sub> (ppm @ 15% O <sub>2</sub> , ISO)                       | 164.40             | 163.57             | 165.40             | ×                   |
| NOx LB/MMBTU   | 0.38               |                    |                    | 164.45              |
| CO ppm (raw measured dry)  |                    | 0.38               | 0.39               | 0.38                |
| CO ppm (BIAS Corrected)  | 24.77              | 25.44              | 24.22              | 24.81               |
| CO g/BIIP-IIR  | 24.77              | 25.44              | 24.22              | 24.81               |
| CO LB/HR   | 0.38               | 0.39               | 0.37               | 0,38                |
| CO LB/MR<br>CO LB/MMBTU **   | 9.60               | 10.31              | 10.05              | 9,99                |
|  | • 0.07             | 0.07               | 0.07               | 0.07                |
| CO (ppm @ 15% O <sub>2</sub> )   | 31,98              | 32.35              | 30.47              | 31.60               |
| CO (ppm @ 15% O <sub>2</sub> , ISO)                                    | 50.12              | 51.23              | 47.75              | 49.70               |
| % O <sub>2</sub> (raw measured dry)                                    | 16.33              | 16.26              | 16,21              | 16.27               |
| % O2 (BIAS Corrected)  | 16.33              | 16.26              | 16.21              | 16.27               |
| Calculated Emissions Concentrations                                    |                    |                    |                    | · .                 |
| % CO <sub>2</sub> (Wet) *  | 2.47               | 2.51               | 2.53               | 2.50                |
| %CO <sub>2</sub> (Dry) *   | 2.63               | 2.67               | 2.69               | 2.66                |
| % II <sub>2</sub> O *  | 5,84               | 5.98               | 5.95               | 5.92                |
| % O <sub>2</sub> (Wet) *   | 15.38              | 15.29              | 15.25              | 15.30               |
| % N <sub>2</sub> + CO (Wet) *-   | 76.31              | 76.23              | 76.27              | 76.27               |
| Calculated Flows   | 1 10.01            | 70.23              | /0,2/              | 10,27               |
| Fuel Flow- (SCFM)  | 2175.17            | 2310.33            | 2392.00            | 2202.50             |
| Fuel Flow - (SCFII)  | 130,510            | 138,620            | 143,520            | 2292.50<br>137,550  |
| Fuel Flow (LB/HR)  | 4,180,4            | 4,425.0            | 4,585.3            | 4,397               |
| Exhaust Flow (LB/HR)   | 340,442.3          | 356,763.9          | 365,434.5          | 354,214             |
| Exhaust Flow (WSCFM)   | 89,045.7           | 93,309.4           | 95,692.5           | 92,683              |
| Air Flow (WSCFM)<br>Air Flow (WSCFM)<br>Ashaust Flow Method 19 (wscfm) | 85,202             | 89,146             | 91,324             | 88,557              |
| Exhaust Flow Method 19 (wscfm)   | 88,661             | 92,750             | 95,004             | 92,138              |
| Exhaust Flow Method 19 (Ibm/min)                                       | 3,958              | 4,142              | 4,241              | 4,114               |
| Air flow Beshouri (scfm)   | 6,765,89           | 7,081.76           | 7,256.71           | 7,035               |
| BSAC, #/BHP-hr   | 88,030,82<br>34,28 | 92,140.57<br>33.79 | 94,416.88<br>33.94 | <u>91,529</u><br>34 |
| Fuel Flow Measurements   | 54.20              | 33.19              | 33.94              | 34                  |
| uel Flow From Screen(MSCFH)  | 130.51             | 138.62             | 143.52             | 127.55              |
| fuel Flow (SCFH) From Fuel Orifice                                     | 94,010             |                    |                    | 137.55              |
| Fuel Gas Differential Pressure ("H <sub>2</sub> O)                     |                    | 99,510             | 103,116            | 98,879              |
| Fuel Gas Static Pressure (PSIG)  | 57.89<br>352.04    | 65.2<br>351.5      | 70.25              | 64                  |
| Fuel Gas Temperature (°F)  | 49.22              | 50.83              | 51.68              | 352                 |
| ** BASED ON FUEL SPECIFIC DRY F-FACTOR CALCULATION                     | Run 7              | Run 8              | Run 9              |                     |
| * BASED ON CARBON BALANCE (STOICH. + O2)<br>- A/FIS TOTAL MASS RATIO   |                    |                    |                    |                     |

|                                       |          |          | -        |   |
|---------------------------------------|----------|----------|----------|---|
| Run                                   | 4        | 5        | 6        |   |
| Date                                  | 12/18/18 | 12/18/18 | 12/18/18 |   |
| Time                                  | 13:20    | 13:41    | 14:02    |   |
| Engine Operating Conditions           | Low      | Low      | Low      | Averages  |
| Unit Horsepower from Control Panel    | 8,220.1  | 8,925.9  | 9,150.6  | 8,765.5   |
| % Load                                | 26.5     | 28.8     | 29.5     | 28.3  |
| Unit Speed (rpm) C1/GG/GP/Jet         | 3,856.0  | 3,983.0  | 3,977.0  | 3,938.7   |
| % CT Speed                            | 23.4     | 24.2     | 24.2     | 23.9  |
| Gas Compressor Speed (rpm) PT/Booster | 8,265.3  | 8,356.6  | 8,313.6  | 8,311.9   |
| % CT Speed                            | 112.5    | 113.7    | 113.1    | 113.1   |
| Compressor Suction Pressure (PSIG)    | 658.4    | 654.1    | 650.6    | 654.4   |
| Compressor Suction Temperature (°F)   | 41,3     | 41.1     | 41.0     | 41.2  |
| Compressor Discharge Pressure (PSIG)  | 802.6    | 808.8    | 812.8    | 808.1   |
| Compressor Discharge Temperature (°F) | 70       | 71.3     | 73.3     | 71.5  |
| Compressor Flow (MMSCF/D)             | 893.3    | 940.3    | 877.0    | 903.6   |
| % Torque                              | 113.1    | 118.9    | 122,1    | 118.0   |
| Heat Rate (BTU/HP-hr)                 | 12,071.0 | 11,928.6 | 11,466.5 | 11,822.0  |
| Ambient Conditions                    |          |          |          | et e fata de la composition de la compo |
| Ambient Temperature (°F)              | 36.00    | 36.00    | 36.00    | 36.00   |
| Barometric Pressure (psi)             | 13.77    | 13.77    | 13.77    | 13.77   |
| Anibient Relative Humidity (%)        | 56.00    | 56.00    | 59.00    | 57.00   |
| Absolute Humidity (grains/LB)         | 37.95    | 37.95    | 40.00    | 38.63   |

# Table 8. Engine Operating & Ambient Conditions -Unit 701 Low Load

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| Run  | 4                  | 5                  | 6   | ·                                |
|--|--------------------|--------------------|---|----------------------------------|
| Date   | 12/18/18           | 12/18/18           | 12/18/18  |                                  |
| Time   | 13:20              | 13:41              | 12/18/18  |                                  |
| Emissions Concentrations & Calculated Mass Emissions   | Low                | 13:41<br>Low       | Low   |                                  |
| NO <sub>x</sub> ppm (BIAS Corrected)   |                    | 1                  |   | Averages                         |
|  | 58.29              | 63.02              | 65.34   | 62.22                            |
| NO <sub>X</sub> g/BHP-HR   | 1.90               | 2.00               | 1.97  | 1.96                             |
| NO <sub>X</sub> LB/IIR   | 34.42              | 39.35              | 39.72   | 37.83                            |
| NO <sub>X</sub> (рряп @ 15% О <sub>2</sub> )   | 85.13              | 90.69              | 92,89   | 89.57                            |
| NO <sub>X</sub> (ppm @ 15% O <sub>2</sub> , ISO)   | 132.08             | 140.71             | 144.94  | 139.24                           |
| NOx LB/MMBTU   | 0.31               | 0.33               | 0.34  | 0.33                             |
| CO ppm (raw measured dry)  | 47.83              | 40.87              | 37.70   | 42.13                            |
| CO ppm (BIAS Corrected)  | 47.83              | 40.87              | 37.70   | 42.13                            |
| CO g/BHP-HR  | 0.95               | 0.79               | 0.69  | 0.81                             |
| CO LB/IIR  | 17.19              | 15.53              | 13.95   | 15.56                            |
| CO LB/MMBTU **   | 0,16               | 0.13               | 0,12  | 0.14                             |
| CO (ppm @ 15% O <sub>2</sub> )   | 69.85              | 58.81              | 53.60   | /                                |
| CO (ppm @ 15% O <sub>2</sub> , ISO)  | 108.38             |                    |   | 60.75                            |
| % O <sub>2</sub> (raw measured dry)  |                    | 91.25              | 83.63   | 94.42                            |
| % O <sub>2</sub> (BIAS Corrected)  | 16.86              | 16.80              | 16.75   | 16.80                            |
|  | 16.86              | 16.80              | 16.75   | 16.80                            |
| Calculated Emissions Concentrations  |                    | 1. J. C.           | e de la constante de la constan | $\{i_1,\ldots,i_{n-1},i_{n+1}\}$ |
| % CO <sub>2</sub> (Wet) *  | 2.22               | 2.25               | 2.27  | 2.25                             |
| %CO <sub>2</sub> (Dry) *   | 2.34               | 2.37               | 2.40  | 2.37                             |
| % II <sub>2</sub> O *  | 5,19               | 5,25               | 5,34  | 5,26                             |
| % O <sub>2</sub> (Wet) *   | 15.98              | 15.92              | 15.86   | 15.92                            |
| % N <sub>2</sub> + CO (Wet) *  | 76.60              | 76,58              | 76.53   | 76.57                            |
| Calculated Flows   |                    |                    |   | 10131                            |
| Fuel Flow - (SCFM)   | 1784.00            | 1914.33            | 1886.50   | 1961.61                          |
| Ivel Flow - (SCFH)   | 107,040            | 114,860            | 113,190   | 1861.61<br>111,697               |
| Fuel Flow (LB/IIR)   | 3,413,0            | 3,669.0            | 3,614.5   | 3,565                            |
| Exhaust Flow (LB/IIR)  | 314,204.1          | 332,509.0          | 324,141.3   | 323,618                          |
| Exhaust Flow (WSCFM)   | 81,544.1           | 86,350,4           | 84,174.4  | 84,023                           |
| Air Flow (WSCFM)   | 78,931             | 83,474             | 81,281  | 81,229                           |
| xhaust Flow Method 19 (wscfm)  | 82,256             | 86,974             | 84,677  | 84,636                           |
| Exhaust Flow Method 19 (Ibm/min)   | 3,670              | 3,881              | 3,779   | 3,776                            |
| ixhaust Flow Carbon Balance (Ibm/min)<br>Air flow Beshouri (sefin)   | 6,250.20           | 6,612.01           | 6,440.06  | 6,434                            |
| 3SAC, #/BHP-hr   | 81,321.10<br>43.76 | 86,028,70<br>42.62 | 83,791.46<br>40.48  | 83,714                           |
| fuel Flow Measurements   | 43.70              | 42.02              | 40.48   | 42                               |
| uel Flow From Screen(MSCFII)   | 107.04             | 111.00             |   |                                  |
| uel Flow (SCFH) From Fuel Orifice  | 107.04             | 114.86             | 113.19  | 111.70                           |
| Fuel Gas Differential Pressure ("H <sub>2</sub> O)   | 76,753             | 82,509             | 81,283  | 80,182                           |
| fuel Gas Static Pressure (PSIG)  | 38.45              | 44.25              | 42.96   | 42                               |
| Fuel Gas Temperature (°F)  | 352.31             | 352.31             | 352.85  | 352                              |
|  | 47.85              | 46.2               | 46.97   | 47                               |
| ** BASED ON FUEL SPECIFIC DRY F-FACTOR CALCULATION<br>* BASED ON CARBON BALANCE (STOICH. + 02)<br>- A/FIS TOTAL MASS RATIO | Run 4              | Run 5              | Run 6   |                                  |

Table 9. Emissions Concentrations/Calculated Emissions, & Flow Data –Unit 701 Low Load

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## 3. FACILITY AND PROCESS DESCRIPTION

TransCanada's GLGT Wakefield Compressor Station (CS7) is located in Wakefield, MI and operates a natural gas fired compressor station. The plant is located at 400 Great Lakes Road, Wakefield, MI. The Unit 701 is a General Electric Model LM2500 GE Stationary Gas Turbine.

|         | Unit 701 Production Data (HP) |               |              |          |
|---------|-------------------------------|---------------|--------------|----------|
| Run No. | High Load                     | Mid-High Load | Mid-Low Load | Low Load |
| 1       | 17,831                        | 13,742        | 11,326       | 8,220    |
| 2       | 18,264                        | 13,280        | 12,024       | 8,926    |
| 3       | 17,919                        | 14,840        | 12,265       | 9,151    |
| Average | 18,005                        | 13,954        | 11,872       |          |

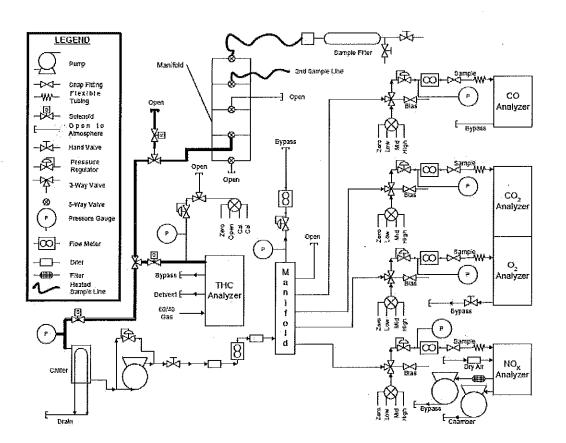
# Table 10. Unit 701 Production Data (Horse Power)

**General Information** Date: 18-Dec-18 **Permit Limits** Company: GLGT ppm@15% g/Bhp-Hr lb/hr 1 </=184 NOX: </=123 Station: Wakefield CO: VOC: Unit: 701 H2CO: Limits are actually listed as average values **Engine Type:** General Electric CT Rated RPM: 16450 RPM PT Rated RPM: 7350 RPM Rated BHP: 31000 BHP 1 - 1**Fuel Gas Analysis Fuel Meter Type** Constituent **Mole Percent** Enter Type from List Below 2 Nitrogen 0.716 Orifice Meter (upstream pressure tap): 1 Carbon Dioxide 0.681 Orifice Meter (downstream pressure tap): 2 Methane 95.056 Electronic Flow Meter (EFM): 3 Ethane 3.425 Venturi (Nozzle) Meter: 4 0.102 Propane Roots Meter w/ Accumulator: 5 **I-Butane** 0.008 N-Butane 0.009 Pipe I.D.: 3.068 I-Pentane 0.002 Orifice LD.: N-Pentane 0.001 1.5 Hexane + 0.000 100.000 Total

#### Table 11. Unit 701 General Information

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# Figure 1. Unit 701 Flow Schematic

#### 4. TEST PROCEDURES

EQM and EQM's affiliates and subcontractors use current U.S. EPA accepted testing methodologies in their Air Quality Programs as listed in the U.S. Code of Federal Regulations, Title 40, Part 60, Appendix A. For this testing program, the following specific methodologies were utilized:

- U.S. EPA Method 3A Determination of Oxygen and Carbon Dioxide Concentrations in Emissions From Stationary Sources (Instrumental Analyzer Procedure)
- U.S. EPA Method 7E Determination of Nitrogen Oxides Emissions From Stationary Sources (Instrumental Analyzer Procedure)
- U.S. EPA Method 10– Determination of Carbon Monoxide Emissions From Stationary Sources (Instrumental Analyzer Procedure)

USEPA Methods 3A, 7E, and 10 were performed at the Exhaust Stack sampling location by continuously extracting a gas sample from the stack through a single point stainless steel sample probe. The extracted sample was pulled through a series of filters to remove any particulate matter. Directly after the probe, the sample was conditioned by a series of refrigeration dryers to remove moisture from the gas stream. After the refrigeration dryers, the sample was transported through a Teflon® line to the analyzers. The flow of the stack gas sample was regulated at a constant rate to minimize drift.

At the start of the day, each monitor was checked for calibration error by introducing zero, midrange and high-range EPA Protocol 1 gases to the measurement system at a point upstream of the analyzers. In this report, the calibration error test is referred to as instrument calibration. The gas was injected into the sampling valve located at the outlet of the sampling probe. The bias test was conducted before and after each consecutive test run by introducing zero and upscale calibration gases for each monitor. The upscale calibration gases used for each monitor were the high calibration gases.

Measurement System Performance Specifications were as follows:

- Analyzer Calibration Error Less than +/- 2% of the span of the zero, mid-range and high-range calibration gases.
- Sampling System Bias Less than +/-5% of the span for the zero, mid-range and high-range calibration gases.
- Zero Drift Less than +/-3% of the span over the period of each test run.
- Calibration Drift Less than +/-3% of the span over the period of each set of runs.

Calculations that were used in this testing event for the Unit 701 are as follows:

NOx concentrations will be reported in the units of ppm dry volume corrected to 15% Oxygen.

**Calibration Correction** 

$$C_{GAS} = \left(C_R - C_O\right) \frac{C_{MA}}{C_M - C_O}$$

## Where:

| C <sub>GAS</sub> : | Corrected flue gas concentration (ppmvd)         |
|--------------------|--|
| C <sub>R</sub> :   | Flue gas concentration (ppmvd)                   |
| C <sub>O</sub> :   | Average of initial and final zero checks (ppmvd) |
| C <sub>M</sub> :   | Average of initial and final span checks (ppmvd) |
| $C_{MA}$ :         | Actual concentration of span gas (ppmvd)         |

EPA F-Factor

$$F_{d} = \frac{\left[ (3.64 \cdot H_{WP\%} \cdot 100) + (1.53 \cdot C_{WP\%} \cdot 100) \right]}{GCV} \cdot 10^{6} + \frac{\left[ (0.14 \cdot N_{2WP\%} \cdot 100) - (0.46 \cdot O_{2WP\%} \cdot 100) \right]}{GCV} \cdot 10^{6} - \frac{GCV}{\rho_{FuelGas}} \cdot 10^{6}$$

# Where:

| $F_d$ :                 | Fuel specific F-factor, dscf/MMBtu  |
|-------------------------|-------------------------------------|
| HW1%:                   | Hydrogen weight percent             |
| $C_{Wt\%}$ :            | Carbon weight percent               |
| $N_{2Wt\%}$ :           | Nitrogen weight percent             |
| $O_{2Wt\%}$ :           | Oxygen weight percent               |
| GCV:                    | Heating value of the fuel, BTU/dscf |
| $ ho_{Fuel\ Gas}$ :     | Density of the fuel gas, lb/scf     |
| Nox Corrected to 15% O2 |                                     |

$$NO_x = NO_{x ebs} \approx \frac{5.9}{20.9 - \frac{9}{20.0}}$$

Where:

 $E_{m:}$  Pollutant concentration corrected to 15% O<sub>2</sub>, ppm

NO<sub>x</sub>: Pollutant concentration, ppm

%O<sub>2</sub>: Oxygen concentration in percent, measured on a dry basis

Quality Assurance: Field quality assurance, the quality assurance/ quality control procedures as outlined in the test methods will be followed. Calibration gases shall be USEPA Protocol 1 certified. Analyzer calibrations will be performed at the beginning of each test day along with the required system pre- and post-test calibration. The final test report will include the complete data recorder output used to calculate emission rates.

Mass Emissions Calculations, lb/hr

$$NO_{\frac{\gamma_b}{hr}} = C_d \times F_d \times \frac{209}{209 - \%O_2} \times Q_h \times \frac{GCV}{10^6}$$

Where:

*Cd:* Pollutant concentration, lb/scf

*Fd:* Fuel specific F-factor, dscf/MMBtu

*Qh:* Fuel flow, scf/hr

%O2: Oxygen concentration in percent, measured on a dry basis

GCV: Upper dry heating value of fuel, Btu/dscf

### 5. QUALITY ASSURANCE PROCEDURES

Each reference method presented in the U.S. Code of Federal Regulations details the instrument calibration requirements, sample recovery and analysis, data reduction and verification, types of equipment required, and the appropriate sampling and analytical procedures to ensure maximum performance and accuracy. EQM and EQM's affiliates and subcontractors adhere to the guidelines for quality control set forth by the United States Environmental Protection Agency. These procedures are outlined in the following documents:

- Code of Federal Regulations, Title 40, Part 51
- Code of Federal Regulations, Title 40, Part 60
- Quality Assurance Handbook, Volume 1, EPA 600/9-76-005
- Quality Assurance Handbook, Volume 2, EPA 600/4-77-027a
- Quality Assurance Handbook, Volume 3, EPA 600/4-77-027b

#### 6. CONCLUSIONS

An Emissions Test was conducted on the internal combustion reciprocating Unit 701 at TransCanada's GLGT LP's Wakefield Compressor Station located in Wakefield, Michigan. The testing was conducted on December 18, 2018.

During the course of the testing, the Unit 701 conformed to the requirements of Code of Federal Regulations, Title 40, Part 60, Appendix A and Subpart GG.

The usefulness and/or significance of the emissions values presented in this document as they relate to the compliance status of the Unit 701 emissions shall be determined by others.

For additional information pertaining to the testing program see Appendix E of this report