



## AIR EMISSION TEST REPORT

Title: AIR EMISSION TEST REPORT FOR THE VERIFICATION OF  
AIR POLLUTANT EMISSIONS FROM LANDFILL GAS FIRED  
ENGINE – GENERATOR SETS

Report Date: July 25, 2019

Test Date(s): July 2, 2019 & July 16, 2019

### Facility Information

Name:	North American Natural Resources Southeast Berrien County Landfill
Street Address:	31/2 Chamberlain Road
City, County, State:	Buchanan, Berrien, Michigan
Facility SRN:	N:
Phone:	(248) 35-250

### Emission Unit and Permit Information

Operating Permit No.:	MI-ROP-N5 -2021
Emission Unit Nos.:	EUENGINE3-S2 & EUENGINE2-S2

### Testing Contractor

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Project No.:	1905

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AIR EMISSION TEST REPORT  
FOR THE  
VERIFICATION OF AIR POLLUTANT EMISSIONS  
FROM  
LANDFILL GAS FIRED ENGINE – GENERATOR SETS  
  
NORTH AMERICAN NATURAL RESOURCES  
SOUTHEAST BERRIEN COUNTY LANDFILL

## 1.0 INTRODUCTION

North American Natural Resources (NANR) operates gas-fired reciprocating internal combustion engine (RICE) and electricity generator sets at the Southeast Berrien County Landfill in Buchanan, Berrien County, Michigan. The RICE are fueled by landfill gas (LFG) that is recovered from the Southeast Berrien County Landfill. The recovered gas is transferred to NANR where it is treated and used as fuel.

The Michigan Department of Environment, Great Lakes, and Energy-Air Quality Division (EGLE-AQD) has issued to NANR a Renewable Operating Permit (MI-ROP-N5432-2021) for operation of the renewable electricity generation facility, which consists of three (3) CAT® Model No. G3520C RICE-generator set identified as emission units EUENGINE1-S2, EUENGINE2-S2, and EUENGINE3-S2 (Flexible Group ID: FGENGINE-S2).

Air emission compliance testing was performed pursuant to ROP No. MI-ROP-N5432-2021 and the federal Standards of Performance for Stationary Spark Ignition Internal Combustion Engines (the SI-RICE NSPS; 40 CFR Part 60 Subpart JJJJ). The conditions of ROP No. MI-ROP-N5432-2021 state:

*... The permittee must conduct performance testing every 8,760 hours or 3 years after the initial test, whichever comes first. ... to demonstrate compliance with the emission limits in 40 CFR 60.4233(e) ... If a performance test is required, the performance test shall be conducted according to 40 CFR 60.4244.*

The compliance testing presented in this report was performed by Impact Compliance & Testing, Inc. (ICT), a Michigan-based environmental consulting and testing company. ICT representatives Brad Thome and Jory VanEss performed the field sampling and measurements July 2, 2019 (EUENGINE3-S2) and July 16, 2019 (EUENGINE2-S2). The emission test events for EUENGINE3-S2 and EUENGINE2-S2 were performed within 8,760 operating hours of the previous test event, which occurred March 27-28, 2018. EUENGINE1-S2 is currently undergoing maintenance and will be tested at a later date. The EGLE-AQD will be notified prior to performing the emission test event for EUENGINE1-S2.

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The exhaust gas sampling and analysis was performed using procedures specified in the Stack Test Protocol that was reviewed and approved by the EGLE-AQD in the May 31, 2019 Test Plan Approval Letter. EGLE-AQD representatives Mr. Matt Deskins and Mr. Dave Patterson observed portions of the testing project.

The engine emission performance tests consisted of triplicate, one-hour sampling periods for nitrogen oxides (NO<sub>x</sub>), carbon monoxide (CO), volatile organic compounds (VOC, as non-methane hydrocarbons (NMHC)). Exhaust gas velocity, moisture content, oxygen (O<sub>2</sub>) content, and carbon dioxide (CO<sub>2</sub>) content were determined for each test period to calculate pollutant mass emission rates.

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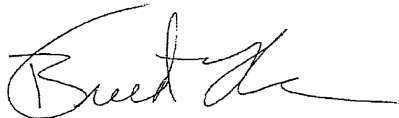
### **Report Certification**

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 NANR employees or representatives. This test report has been reviewed by NANR representatives and approved for submittal to the EGLE-AQD.

I certify that the testing was conducted in accordance with the specified test methods and submitted Stack Test Protocol 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:



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Impact Compliance & Testing, Inc.

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## **2.0 SUMMARY OF TEST RESULTS AND OPERATING CONDITIONS**

### **2.1 Purpose and Objective of the Tests**

The conditions of MI-ROP-N5432-2021 and 40 CFR Part 60 Subpart JJJJ require NANR to test engines EUENGINE1-S2, EUENGINE2-S2, and EUENGINE3-S2 for CO, NO<sub>x</sub>, and VOC emissions every 8,760 hours of operation or three (3) years, whichever comes first.

### **2.2 Operating Conditions During the Compliance Tests**

The testing was performed while the NANR engine/generator sets were operated at maximum operating conditions (within 10% of rated capacity). The rated capacity for the CAT® G3520C engine generator sets are 1,600 kilowatt (kW) electricity output. NANR representatives provided kW output in 15-minute increments for each test period. The EUENGINE3-S2 and EUENGINE2-S2 generator electricity output ranged between 1,518 and 1,604 kW for each test period.

Fuel flowrate (standard cubic feet per minute (scfm)), fuel methane content (%), air-to-fuel ratio, and inlet pressure (psi) were also recorded by NANR representatives in 15-minute increments for each test period. The EUENGINE3-S2 and EUENGINE2-S2 fuel consumption rate ranged between 575 and 598 scfm, fuel methane content ranged between 47.0 and 49.6%, air-to-fuel ratio ranged between 7.3 and 7.7, and inlet pressure ranged between 45.5 and 49.8.

Appendix 1 provides operating records provided by NANR representatives for the test periods.

Engine output (bhp) cannot be measured directly and was calculated based on the recorded electricity output, the calculated CAT® Model G3520C generator efficiency (95.7%), and the unit conversion factor for kW to horsepower (0.7457 kW/hp).

$$\text{Engine output (bhp)} = \text{Electricity output (kW)} / (0.957) / (0.7457 \text{ kW/hp})$$

Table 2.1 presents a summary of the average engine operating conditions during the test periods.

### **2.3 Summary of Air Pollutant Sampling Results**

The gases exhausted from the sampled LFG fueled RICE (EUENGINE3-S2 and EUENGINE2-S2) were sampled for three (3) one-hour test periods during the compliance testing performed July 2, 2019 (EUENGINE3-S2) and July 16, 2019 (EUENGINE2-S2).

Table 2.2 presents the average measured CO, NO<sub>x</sub>, and VOC emission rates for each engine (average of the three test periods).

Test results for each one-hour sampling period and comparison to the permitted emission rates are presented in Section 6.0 of this report.

Table 2.1 Average engine operating conditions during the test periods

Engine Parameter	EUENGINE3-S2 CAT® G3520C	EUENGINE2-S2 CAT® G3520C
Generator output (kW)	1,524	1,601
Engine output (bhp)	2,136	2,243
Engine LFG fuel use (scfm)	583	592
LFG methane content (%)	47.9	49.6
Air-to-fuel ratio	7.4	7.6
Inlet pressure (psi)	46.6	49.1
Exhaust temperature (°F)	977	950

Table 2.2 Average measured emission rates for each engine (three-test average)

Emission Unit	CO Emission Rates		NOx Emission Rates		VOC Emission Rates	
	(lb/hr)	(g/bhp-hr)	(lb/hr)	(g/bhp-hr)	(lb/hr)	(g/bhp-hr)
EUENGINE3-S2	11.9	2.54	1.28	0.27	0.66	0.14
EUENGINE2-S2	12.2	2.46	1.21	0.24	0.76	0.15
<i>Permit Limit</i>	-	2.8	-	0.62	-	1.0

### **3.0 SOURCE AND SAMPLING LOCATION DESCRIPTION**

#### **3.1 General Process Description**

NANR operates three (3) CAT® Model No. G3520C RICE-generator sets at its Southeast Berrien County Generating station. The units are fired exclusively with LFG that is recovered from the Southeast Berrien County Landfill solid waste disposal facility and is treated prior to use.

#### **3.2 Rated Capacities and Air Emission Controls**

The CAT® G3520C engine generator sets have a rated design capacity of:

- Engine Power; 2,242 bhp
- Electricity Generation; 1,600 kW

Each RICE is equipped with an electronic air-to-fuel ratio (AFR) controller that blends the appropriate ratio of combustion air and treated LFG fuel. The electronic AFR controller monitors engine performance parameters and automatically adjusts the AFR and ignition timing to maintain efficient fuel combustion.

The RICE are not equipped with add-on emission control devices. The AFR controller maintains efficient fuel combustion, which minimizes air pollutant emissions. Exhaust gas is exhausted directly to atmosphere through a noise muffler and vertical exhaust stack.

#### **3.3 Sampling Locations**

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

The exhaust stack sampling ports for the CAT® Model G3520C engines (EUENGINE1-S2, EUENGINE2-S2, and EUENGINE3-S2) are located before the muffler in a horizontal exhaust duct with an inner diameter of 13.0 inches. The duct is equipped with two (2) sample ports, opposed 90°, that provide a sampling location 28 inches (2.15 duct diameters) upstream and 144 inches (11.1 duct diameters) downstream from any flow disturbance.

All sample port locations satisfy the USEPA Method 1 criteria for a representative sample location. Individual traverse points were determined in accordance with USEPA Method 1.

Appendix 2 provides diagrams of the emission test sampling locations.



#### 4.0 **SAMPLING AND ANALYTICAL PROCEDURES**

A Stack Test 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 1	Exhaust gas velocity measurement locations were determined based on the physical stack arrangement and requirements in USEPA Method 1.
USEPA Method 2	Exhaust gas velocity pressure was determined using a Type-S Pitot tube connected to a red oil incline manometer; temperature was measured using a K-type thermocouple connected to the Pitot tube.
USEPA Method 3A	Exhaust gas O <sub>2</sub> and CO <sub>2</sub> 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 NO <sub>x</sub> concentration was determined using chemiluminescence instrumental analyzers.
USEPA Method 10	Exhaust gas CO concentration was measured using an infrared instrumental analyzer.
USEPA Method 25A / ALT-096	Exhaust gas VOC (as NMHC) concentration was determined using a flame ionization analyzer equipped with methane separation column.

##### 4.2 **Exhaust Gas Velocity Determination (USEPA Method 2)**

The RICE exhaust stack gas velocities and volumetric flow rates were determined using USEPA Method 2 once for each test period. An S-type Pitot tube connected to a red-oil manometer was used to determine velocity pressure at each traverse point across the stack cross section. Gas temperature was measured using a K-type thermocouple mounted to the Pitot tube. The Pitot tube and connective tubing were leak-checked prior to the test event to verify the integrity of the measurement system.

The absence of significant cyclonic flow at the sampling location was verified using an S-type Pitot tube and oil manometer. The Pitot tube was positioned at each velocity traverse

point with the planes of the face openings of the Pitot tube perpendicular to the stack cross-sectional plane. The Pitot tube was then rotated to determine the null angle (rotational angle as measured from the perpendicular, or reference, position at which the differential pressure is equal to zero).

Appendix 3 provides exhaust gas flowrate calculations and field data sheets.

#### **4.3 Exhaust Gas Molecular Weight Determination (USEPA Method 3A)**

CO<sub>2</sub> and O<sub>2</sub> content in the RICE exhaust gas stream was measured continuously throughout each test period in accordance with USEPA Method 3A. The CO<sub>2</sub> content of the exhaust was monitored using a Servomex 4900 single beam single wavelength (SBSW) infrared gas analyzer. The O<sub>2</sub> 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, measurement of O<sub>2</sub> and CO<sub>2</sub> 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.

Appendix 4 provides O<sub>2</sub> and CO<sub>2</sub> calculation sheets. Raw instrument response data are provided in Appendix 5.

#### **4.4 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.

#### **4.5 NO<sub>x</sub> and CO Concentration Measurements (USEPA Methods 7E and 10)**

NO<sub>x</sub> 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<sub>x</sub> analyzer and a California Analytics/Fuji ZRF infrared CO analyzer.

Throughout each test period, a continuous sample of the engine exhaust gas was extracted from the stack using the Teflon® heated sample line and gas conditioning system and delivered to the instrumental analyzers. Instrument response for each analyzer was recorded on an ESC Model 8816 data acquisition system that 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.

Appendix 4 provides CO and NO<sub>x</sub> calculation sheets. Raw instrument response data are provided in Appendix 5.

#### **4.6 Measurement of Volatile Organic Compounds (USEPA Method 25A/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 an alternate test method approving the use of the TEI 55i-series analyzer as an effective instrument for measuring NMOC from gas-fueled RICE (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 NMHC 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 (described in Section 5.0 of this document).

Appendix 4 provides VOC calculation sheets. Raw instrument response data for the NMHC analyzer is provided in Appendix 5.

### **5.0 QA/QC ACTIVITIES**

#### **5.1 Flow Measurement Equipment**

Prior to arriving onsite, the instruments used during the source test to measure exhaust gas properties and velocity (barometer, pyrometer, and Pitot tube) were calibrated to specifications in the sampling methods.

The absence of cyclonic flow for each sampling location was verified using an S-type Pitot tube and oil manometer. The Pitot tube was positioned at each of the velocity traverse

points with the planes of the face openings of the Pitot tube perpendicular to the stack cross-sectional plane. The Pitot tube was then rotated to determine the null angle (rotational angle as measured from the perpendicular, or reference, position at which the differential pressure is equal to zero).

## **5.2 NO<sub>x</sub> Converter Efficiency Test**

The NO<sub>2</sub> – NO conversion efficiency of the Model 42c analyzer was verified prior to the testing program. A USEPA Protocol 1 certified concentration of NO<sub>2</sub> was injected directly into the analyzer, following the initial three-point calibration, to verify the analyzer's conversion efficiency. The analyzer's NO<sub>2</sub> – NO converter uses a catalyst at high temperatures to convert the NO<sub>2</sub> to NO for measurement. The conversion efficiency of the analyzer is deemed acceptable if the measured NO<sub>2</sub> concentration is greater than or equal to 90% of the expected value.

The NO<sub>2</sub> – NO conversion efficiency test satisfied the USEPA Method 7E criteria (measured NO<sub>2</sub> concentration was greater than 90% of the expected value.)

## **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<sub>x</sub>, CO, O<sub>2</sub>, and CO<sub>2</sub> 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 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 each day of the testing program, initial three-point instrument calibrations were performed for the NO<sub>x</sub>, CO, CO<sub>2</sub>, and O<sub>2</sub> 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 CO<sub>2</sub>, O<sub>2</sub>, NO<sub>x</sub>, 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 was performed for each RICE exhaust stack. 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 the RICE exhaust stacks indicated that the measured O<sub>2</sub> and CO<sub>2</sub> concentrations did not vary by more than 5% of 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 each RICE exhaust stack.

## **5.7 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.

Appendix 6 presents test equipment quality assurance data (NO<sub>2</sub> – 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, Pitot tube calibration records, and 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 Tables 6.1 through 6.2.

The measured air pollutant concentrations and emission rates for EUENGINE3-S2, and EUENGINE2-S2 are less than the allowable limits specified in MI-ROP-N5432-2021:

- 2.8 grams per brake horsepower-hour (g/bhp-hr) for CO;
- 0.62 g/bhp-hr for NO<sub>x</sub>; and
- 1.0 g/bhp-hr 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 Stack Test Protocol. The engine-generator sets were operated within 10% of maximum output and no variations from normal operating conditions occurred during the engine test periods.

Originally, the test event for EUENGINE1-S2, EUENGINE2-S2, and EUENGINE3-S2 was scheduled to occur June 11-12, 2019. Due to operating issues and necessary engine maintenance, EUENGINE3-S2 was tested July 2, 2019, EUENGINE2-S2 was tested July 16, 2019, and EUENGINE1-S2 will be tested after undergoing additional maintenance. These scheduling adjustments were discussed with and approved by EGLE-AQD representative Mr. Dave Patterson.

**Impact Compliance & Testing, Inc.**NANR Southeast Berrien County Landfill  
Air Emission Test ReportJuly 25, 2019  
Page 12Table 6.1 Measured exhaust gas conditions and NO<sub>x</sub>, CO, and VOC air pollutant emission rates for Engine No. 3 (EUENGINE3-S2)

Test No.	1	2	3	
Test date	7/2/19	7/2/19	7/2/19	Three Test
Test period (24-hr clock)	800-900	920-1020	1040-1140	Average
Fuel flowrate (scfm)	584	585	581	583
Generator output (kW)	1,521	1,529	1,523	1,524
Engine output (bhp)	2,131	2,142	2,134	2,136
LFG methane content (%)	48.6	47.9	47.3	47.9
Air-to-fuel ratio	7.4	7.3	7.4	7.4
Inlet Pressure (psi)	46.5	46.5	46.9	46.6
<u>Exhaust Gas Composition</u>				
CO <sub>2</sub> content (% vol)	11.6	11.7	11.7	11.7
O <sub>2</sub> content (% vol)	7.62	7.73	7.80	7.72
Moisture (% vol)	10.0	15.7	15.6	13.8
Exhaust gas temperature (°F)	977	975	979	977
Exhaust gas flowrate (dscfm)	4,289	4,110	4,578	4,326
Exhaust gas flowrate (scfm)	4,767	4,876	5,422	5,022
<u>Nitrogen Oxides</u>				
NO <sub>x</sub> conc. (ppmvd)	41.9	41.2	41.2	41.4
NO <sub>x</sub> emissions (lb/hr)	1.29	1.21	1.35	1.28
NO <sub>x</sub> emissions (g/bhp*hr)	0.27	0.26	0.29	0.27
Permitted emissions (g/bhp*hr)	-	-	-	0.62
<u>Carbon Monoxide</u>				
CO conc. (ppmvd)	631	632	634	632
CO emissions (lb/hr)	11.8	11.3	12.7	11.9
CO emissions (g/bhp*hr)	2.51	2.40	2.69	2.54
Permitted emissions (g/bhp*hr)	-	-	-	2.8
<u>Volatile Organic Compounds</u>				
VOC conc. (ppmv)	19.2	19.1	18.9	19.0
VOC emissions (lb/hr)	0.63	0.64	0.70	0.66
VOC emissions (g/bhp*hr)	0.13	0.14	0.15	0.14
Permitted emissions (g/bhp*hr)	-	-	-	1.0

**Impact Compliance & Testing, Inc.**NANR Southeast Berrien County Landfill  
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Page 13Table 6.2 Measured exhaust gas conditions and NO<sub>x</sub>, CO, and VOC air pollutant emission rates for Engine No. 2 (EUENGINE2-S2)

Test No.	1	2	3	
Test date	7/16/19	7/16/19	7/16/19	Three Test
Test period (24-hr clock)	703-803	835-935	955-1055	Average
Fuel flowrate (scfm)	592	593	591	592
Generator output (kW)	1,601	1,601	1,601	1,601
Engine output (bhp)	2,243	2,243	2,244	2,243
LFG methane content (%)	49.6	49.5	49.6	49.6
Air-to-fuel ratio	7.6	7.6	7.6	7.6
Inlet Pressure (psi)	48.7	49.2	49.5	49.1
<u>Exhaust Gas Composition</u>				
CO <sub>2</sub> content (% vol)	11.3	11.3	11.3	11.3
O <sub>2</sub> content (% vol)	8.04	8.14	8.13	8.10
Moisture (% vol)	14.7	13.4	13.2	13.8
Exhaust gas temperature (°F)	948	942	960	950
Exhaust gas flowrate (dscfm)	3,928	4,000	3,967	3,965
Exhaust gas flowrate (scfm)	4,607	4,617	4,570	4,598
<u>Nitrogen Oxides</u>				
NO <sub>x</sub> conc. (ppmvd)	44.6	42.3	40.9	42.6
NO <sub>x</sub> emissions (lb/hr)	1.26	1.21	1.16	1.21
NO <sub>x</sub> emissions (g/bhp*hr)	0.25	0.25	0.24	0.24
<i>Permitted emissions (g/bhp*hr)</i>	-	-	-	0.62
<u>Carbon Monoxide</u>				
CO conc. (ppmvd)	704	707	702	704
CO emissions (lb/hr)	12.1	12.3	12.2	12.2
CO emissions (g/bhp*hr)	2.44	2.49	2.46	2.46
<i>Permitted emissions (g/bhp*hr)</i>	-	-	-	2.8
<u>Volatile Organic Compounds</u>				
VOC conc. (ppmv)	23.9	24.3	24.1	24.1
VOC emissions (lb/hr)	0.76	0.77	0.76	0.76
VOC emissions (g/bhp*hr)	0.15	0.16	0.15	0.15
<i>Permitted emissions (g/bhp*hr)</i>	-	-	-	1.0



**APPENDIX 1**

- Facility Operating Records

# Landfill Gas Fueled Internal Combustion Engine Process Operating Data

Facility: NANR SE Berrien  
 Location: Buchanan, MI  
 Date: 7/2/19  
 Unit ID: Engine No. 3  
 Operating  
 Hours\* 62,424

Date	Engine #3	Test #	Engine output (kW)	Fuel Flow (scfm)	Fuel CH <sub>4</sub> (%)	Air/Fuel Ratio
7/2/2019	8:00	1	1,520	585	48.9	7.4
	8:15	1	1,521	590	48.6	7.3
	8:30	1	1,527	580	48.5	7.4
	8:45	1	1,519	587	48.3	7.4
	9:00	1	1,518	578	48.7	7.5

7/2/2019	Engine #3	Test #	Engine output (kW)	Fuel Flow (scfm)	Fuel CH <sub>4</sub> (%)	Air/Fuel Ratio
	9:20	2	1,527	581	48.0	7.4
	9:35	2	1,530	588	48.0	7.3
	9:50	2	1,533	591	47.9	7.3
	10:05	2	1,531	583	47.6	7.3
	10:20	2	1,522	584	48.0	7.4

7/2/2019	Engine #3	Test #	Engine output (kW)	Fuel Flow (scfm)	Fuel CH <sub>4</sub> (%)	Air/Fuel Ratio
	10:40	3	1,519	588	47.5	7.4
	10:55	3	1,526	575	47.4	7.3
	11:10	3	1,520	583	47.3	7.4
	11:25	3	1,529	582	47.5	7.4
	11:40	3	1,520	577	47.0	7.4

# Landfill Gas Fueled Internal Combustion Engine Process Operating Data

Facility: NANR SE Berrien  
 Location: Buchanan, MI  
 Date: 7/16/19  
 Unit ID: Engine No. 2  
 Operating  
 Hours\* 63,718

Date	Engine #2	Test #	Engine output (kW)	Fuel Flow (scfm)	Fuel CH <sub>4</sub> (%)	Air/Fuel Ratio
7/16/2019	7:03	1	1,601	587	49.6	7.6
	7:18	1	1,600	592	49.6	7.6
	7:33	1	1,602	596	49.6	7.6
	7:48	1	1,601	590	49.6	7.6
	8:03	1	1,600	593	49.6	7.7

7/16/2019	Engine #2	Test #	Engine output (kW)	Fuel Flow (scfm)	Fuel CH <sub>4</sub> (%)	Air/Fuel Ratio
	8:35	2	1,601	591	49.6	7.6
	8:50	2	1,602	596	49.2	7.6
	9:05	2	1,600	598	49.4	7.7
	9:20	2	1,600	590	49.6	7.7
	9:35	2	1,602	592	49.6	7.6

7/16/2019	Engine #2	Test #	Engine output (kW)	Fuel Flow (scfm)	Fuel CH <sub>4</sub> (%)	Air/Fuel Ratio
	9:55	3	1,604	597	49.6	7.6
	10:10	3	1,600	594	49.6	7.7
	10:25	3	1,599	584	49.6	7.6
	10:40	3	1,603	595	49.6	7.6
	10:55	3	1,600	586	49.6	7.7

# Landfill Gas Fueled Internal Combustion Engine Process Operating Data

Facility Name: North American Natural Resources  
 Location: Southeast Texas  
 Test Date: 7/2/19

Engine ID: 62500393 Unit 3  
 Serial No.: 62500393  
 Operating Hrs.: 62424

**TEST NO. 1**

Start Time:	8:00 AM	Generator Output (kw)	Engine Fuel Use (scfm)	Fuel CH4 (%)	Inlet Pressure (psi)	Air / Fuel Ratio
0 min		1520	585	48.9	46.5	7.4
15 min		1521	590	48.6	46.6	7.3
30 min		1527	580	48.5	45.5	7.4
45 min		1519	587	48.3	47.0	7.4
60 min		1518	578	48.7	46.7	7.5

Stop Time: 9:00 AM

**TEST NO. 2**

Start Time:	9:20 AM	Generator Output (kw)	Engine Fuel Use (scfm)	Fuel CH4 (%)	Inlet Pressure (psi)	Air / Fuel Ratio
0 min		1527	581	48.0	46.0	7.4
15 min		1530	588	48.0	47.2	7.3
30 min		1533	591	47.9	46.6	7.3
45 min		1531	583	47.6	45.9	7.3
60 min		1522	584	48.0	46.8	7.4

Stop Time: 10:20 AM

**TEST NO. 3**

Start Time:	10:40 AM	Generator Output (kw)	Engine Fuel Use (scfm)	Fuel CH4 (%)	Inlet Pressure (psi)	Air / Fuel Ratio
0 min		1519	588	47.5	47.3	7.4
15 min		1526	575	47.4	46.3	7.3
30 min		1520	583	47.3	46.8	7.4
45 min		1529	582	47.5	47.7	7.4
60 min		1520	577	47.0	46.3	7.4

Stop Time: 11:40

Operator Initials: JB

Note - Operating hours are recorded at the beginning of the first test.

# Landfill Gas Fueled Internal Combustion Engine Process Operating Data

Facility Name: NORTH AMERICAN NATURAL RESOURCES  
 Location: SOUTHEAST BERRIEN  
 Test Date: 7-16-19

Engine ID: GZJ00392 UNIT 2  
 Serial No.: GZJ00392  
 Operating Hrs.: 63718

**TEST NO. 1**

Start Time:	Generator Output (kw)	Engine Fuel Use (scfm)	Fuel CH4 (%)	Inlet Pressure (psi)	Air / Fuel Ratio
7:03					
0 min	1601	587	49.6	48.5	7.6
15 min	1600	592	49.6	48.7	7.6
30 min	1602	596	49.6	48.6	7.6
45 min	1601	590	49.6	48.7	7.6
60 min	1600	593	49.6	49.0	7.7
Stop Time: 8:03					

**TEST NO. 2**

Start Time:	Generator Output (kw)	Engine Fuel Use (scfm)	Fuel CH4 (%)	Inlet Pressure (psi)	Air / Fuel Ratio
8:35					
0 min	1601	591	49.6	49.2	7.6
15 min	1602	596	49.2	49.2	7.6
30 min	1600	598	49.4	49.0	7.7
45 min	1600	590	49.6	49.1	7.7
60 min	1602	592	49.6	49.4	7.6
Stop Time: 9:35					

**TEST NO. 3**

Start Time:	Generator Output (kw)	Engine Fuel Use (scfm)	Fuel CH4 (%)	Inlet Pressure (psi)	Air / Fuel Ratio
9:55					
0 min	1604	597	49.6	49.3	7.6
15 min	1600	594	49.6	49.8	7.7
30 min	1599	584	49.6	49.3	7.6
45 min	1603	595	49.6	49.4	7.6
60 min	1600	586	49.6	49.5	7.7
Stop Time: 10:55					

Operator Initials: JB

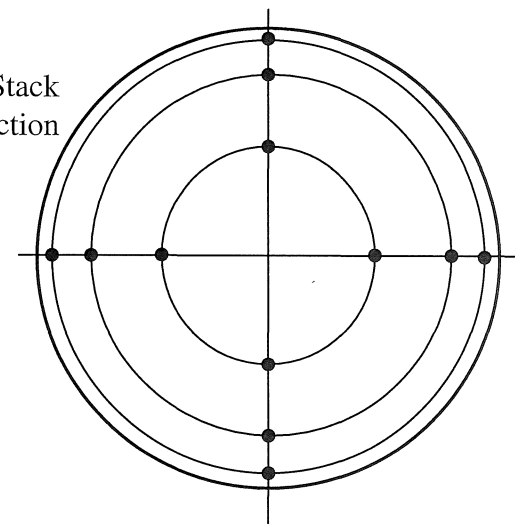
Note - Operating hours are recorded at the beginning of the first test.

## **APPENDIX 2**

- RICE Engine Sample Port Diagram

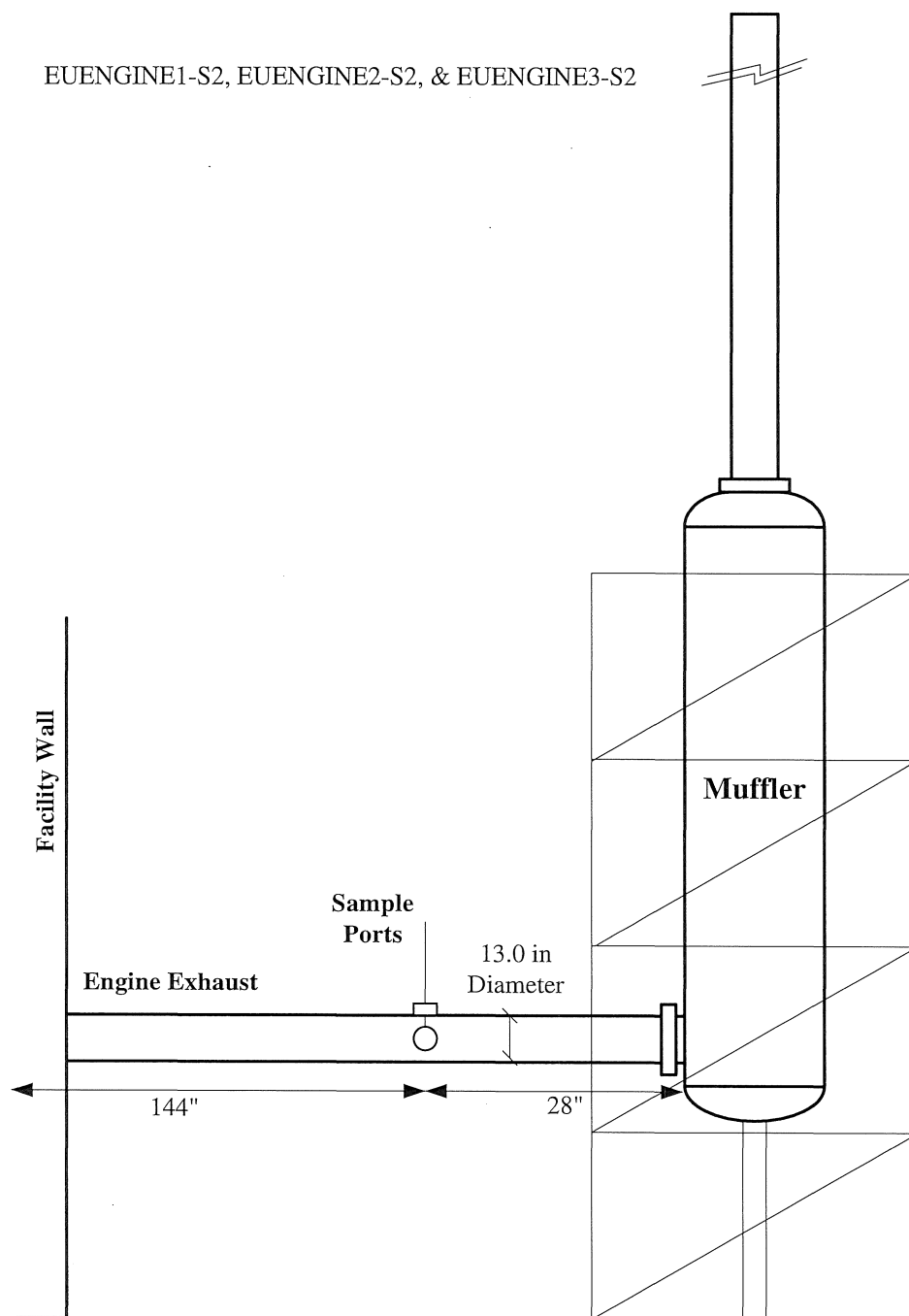
EUENGINE1-S2, EUENGINE2-S2, & EUENGINE3-S2

Exhaust Stack  
Cross-Section



Velocity sample locations as  
measured from stack wall

Pt. #	in.
1	0.57
2	1.90
3	3.85
4	9.15
5	11.10
6	12.43



6/15/16	North American Natural Resources (NANR) Exhaust Sample Location, CAT G3520 ICE		
	Scale None	Sheet 1 of 1	ICT