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**COMPLIANCE TEST REPORT  
ANR PIPELINE-LINCOLN COMPRESSOR STATION  
EMERGENCY GENERATOR APU**

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January 24, 2023

Prepared for:



TC Energy's ANR Pipeline Company  
Lake George, MI

Prepared by:



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PN: 050816.0004

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## PREFACE

I, Karl Mast, do hereby certify that the source emissions testing conducted at TC Energy in Lake George, 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.

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 ANR Pipeline's Lincoln Compressor Station in Lake George, MI.

Karl Mast  
Test Supervisor



### SUMMARY

The compliance testing was performed on the Caterpillar 3412C natural gas fired Generator labeled Emergency Engine (APU) in accordance with the requirements of Permit # ROP-N5586-2019 in order to comply with Title 40, Code of Federal Regulations, Part 60, Subpart JJJJ. The results of the testing are detailed in the following tables.

APU-Summary Results						
Measured Unit	Run 1	Run 2	Run 3	Average	Permit Limit	Pass/Fail
NOx ppmvd @15% O <sub>2</sub>	41.45	41.47	40.83	41.25	160	Pass
CO ppmvd @ 15% O <sub>2</sub>	3.91	3.14	2.47	3.17	540	Pass
VOC ppmvd @ 15% O <sub>2</sub>	39.86	39.87	39.21	39.65	86	Pass



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## 1. INTRODUCTION

This report presents the results of the source emissions testing conducted by Environmental Quality Management, Inc. (EQM) for TC Energy's ANR Pipeline (ANR) at Lincoln compressor station, near Lake George, Michigan, which is located in Clare County. The primary purpose of this testing program was to conduct emissions testing to determine compliance with Permit # ROP-N5586-2019 for the Emergency Generator APU at ANR Pipeline's gas compressor facility.

EQM's responsibility was to conduct the compliance testing for the O<sub>2</sub>, CO, VOC, and NO<sub>x</sub> emissions rates and perform data reduction for conformance evaluation. ANR Pipeline'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 TC Energy's process operations, and Compliance testing. The Compliance testing conducted on the Caterpillar 3412C Generator was performed on January 24, 2023, from 10:45 A.M. to 1:55 P.M.

The following requirements were specific for the testing program:

1. Equipment calibrations performed, and calibration data provided.
2. Three (3) sixty (60) -minute, minimum, O<sub>2</sub>, CO, VOC and NO<sub>x</sub> test runs performed at Emergency Generator labeled Unit APU at maximum achievable load and speed according to pipeline conditions pursuant to EPA, Title 40, Code of Federal Regulations, Part 60, Subpart JJJJ. For determination of VOC concentrations, samples were analyzed as prescribed in Reference Method 18 and Method 25A per 40 CFR 60, Subpart JJJJ to reduce methane levels.
3. Process manufacturing operations maintained at 100 +/- 10 percent peak load condition, or at maximum achievable load according with ambient conditions, 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, VOC and NO<sub>x</sub> emissions determinations.
5. Stratification was found to be less than 5% in the turbine exhausts.
6. Diluent corrected stratification test was performed in accordance with Subpart JJJJ.



The testing program was approved by and/or coordinated with Pedro Amieva, TC Energy's ANR Pipeline Company. The emission testing was performed by Karl Mast, Project Manager, Zach Hill, Field Activities Lead, EQM, and Eli Mergle, Test Technician, EQM. Michigan CAT was contracted to supply the load bank for the testing. The emission testing was observed by Nathanael Gentle, MEGLE.



## 2. TEST RESULTS SUMMARY

The compliance testing was performed on the Generator APU2 in accordance with the requirements of the Title 40, Code of Federal Regulations, Part 60 (40 CFR 60, Appendix A [Subpart JJJJ]). A summary of the test results is given below:

Table 1. APU-Summary Results						
Measured Unit	Run 1	Run 2	Run 3	Average	Permit Limit	Pass/Fail
NOx ppmvd @15% O <sub>2</sub>	41.45	41.47	40.83	41.25	160	Pass
CO ppmvd @ 15% O <sub>2</sub>	3.91	3.14	2.47	3.17	540	Pass
VOC ppmvd @ 15% O <sub>2</sub>	39.86	39.87	39.21	39.65	86	Pass

Based on the information provided above, the Generator 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 Tables 2-3.

Additional testing information may be found in Appendix A.





**Table 2. Operating & Ambient Conditions, Concentrations, & Emissions  
Unit APU**

Summary of Stack Gas Parameters and Test Results					
Generator-APU					
TC Energy Lincoln Compressor Station					
US EPA Test Method 3A, 7, 10, 18, & 25A					
Page 1 of 1					
	<i>RUN NUMBER</i>	<i>O-1</i>	<i>O-2</i>	<i>O-3</i>	<i>Average</i>
	<i>RUN DATE</i>	<i>1/24/2023</i>	<i>1/24/2023</i>	<i>1/24/2023</i>	
	<i>RUN START</i>	<i>10:45</i>	<i>11:50</i>	<i>12:56</i>	
	<b>MEASURED DATA</b>				
$P_{bar}$	Barometric Pressure, inches Hg	28.904	28.891	28.874	28.89
$B_{ws}$	Moisture, % by volume	16.66	16.74	16.65	16.7
	<b>Kilowatts</b>	<b>453.0</b>	<b>453.0</b>	<b>453.0</b>	<b>453.0</b>
	<b>Oxygen</b>				
$O_2$	Concentration PPM Dry	8.42	8.39	8.39	8.40
	<b>Nitrogen Oxides</b>				
$NO_x$	Concentration PPM Dry	87.67	87.92	86.58	87.39
$NO_x$	Concentration PPM Dry @ 15% $O_2$	41.45	41.47	40.83	41.25
	<b>Carbon Monoxide</b>				
CO	Concentration PPM Dry	8.28	6.65	5.23	6.72
CO	Concentration PPM Dry @ 15% $O_2$	3.91	3.14	2.47	3.17
	<b>Total Hydrocarbons</b>				
THC	Concentration PPM Wet C1	1357.15	1325	1253.43	1311.86
THC	Concentration PPM Dry C1	1583.25	1546.81	1462.13	1530.73
$CH_4$	Concentration PPM Bag Sample	1330.3	1293.2	1212.7	1278.73
VOC	Concentration PPM Dry C1	252.95	253.61	249.43	251.99
VOC	Concentration PPM Dry C3	84.32	84.54	83.14	84.00
VOC	Concentration PPM Dry @ 15% $O_2$	39.86	39.87	39.21	39.65

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### 3. PROCESS DESCRIPTION

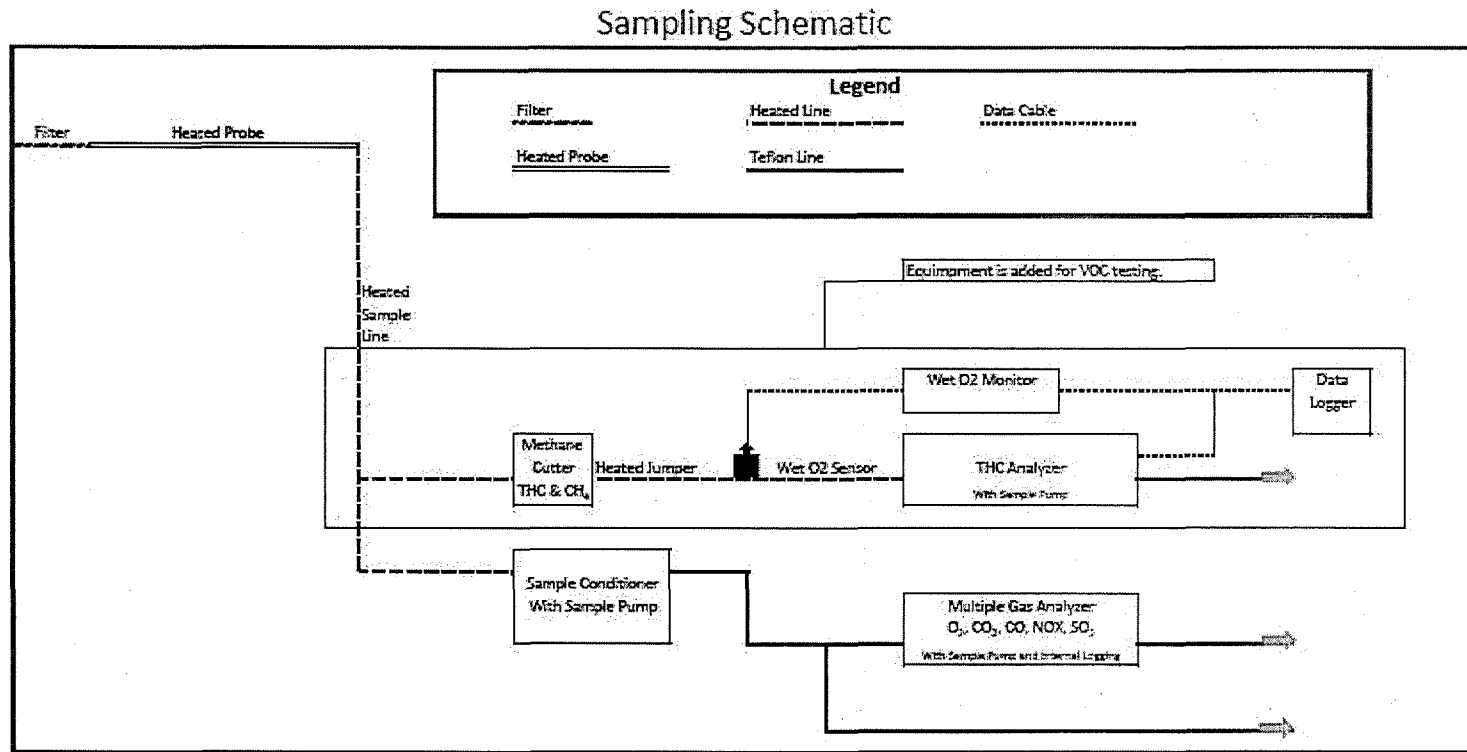
TC Energy's ANR Lincoln Compressor Station is located at 3991 South Hickory, Lake George, MI, Clare County. The plant operates a Caterpillar 3412C natural gas fired internal combustion reciprocating engine utilized for supporting energy needs for the station. It is rated at 755 HP and 500 KW.

The following tables provide a summary of the production rates for the Emergency Generator during the test:

Unit/Measurement	Run 1	Run 2	Run 3	Average	Rated	% Load
<sup>1</sup> APU-HP	607.48	607.48	607.48	607.48	755 HP	80.46
APU-KW	453.0	453.0	453.0	453.0	500 KW	90.60

<sup>1</sup>Horsepower was calculated based on Kilowatt output, which was within the 90-100% operating range. More information may be found in Appendix A.

**Figure 1. Sampling Schematic**



Additional Information pertaining to the Fuel Flows may be found in Appendix B.



#### 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 4 – Determination of Moistures From Stationary Sources
- 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)
- U.S. EPA Method 18 – Determination of VOC Emissions From Stationary Sources (Instrumental Analyzer Procedure)
- U.S. EPA Method 25A – Determination of VOC Emissions From Stationary Sources (Instrumental Analyzer Procedure)

USEPA Methods 3A, 4, 7E, 10, 18 and 25A 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. Moistures were determined by Method 4 (hot and wet oxygen monitor).

At the start of the day, each monitor was checked for calibration error by introducing zero, mid-range 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 are as follows:

Calibration Correction

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

**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<sub>MA</sub>: Actual concentration of span gas (ppmvd)

EPA F-Factor

$$F_d = \frac{[(3.64 \cdot H_{Wt\%} \cdot 100) + (1.53 \cdot C_{Wt\%} \cdot 100)]}{GCV} \cdot 10^6$$

$$+ \frac{[(0.14 \cdot N_{2Wt\%} \cdot 100) - (0.46 \cdot O_{2Wt\%} \cdot 100)]}{GCV} \cdot 10^6$$

$\rho_{FuelGas}$

**Where:**

- F<sub>d</sub>: Fuel specific F-factor, dscf/MMBtu
- H<sub>Wt%</sub>: Hydrogen weight percent
- C<sub>Wt%</sub>: Carbon weight percent
- N<sub>2Wt%</sub>: Nitrogen weight percent
- O<sub>2Wt%</sub>: Oxygen weight percent
- GCV: Heating value of the fuel, BTU/dscf



$\rho_{Fuel Gas}$ : Density of the fuel gas, lb/scf

### Mass Emissions g/bhp-hr

$$Em = Cd \times Fd \times \frac{20.9}{(20.9 - \%O_2)} \times Qh \times \frac{GCV}{10^6} \times \frac{4536}{BHP}$$

#### Where:

- $E_m$ : Pollutant concentration, NO<sub>x</sub>(g/bhp-hr)  
 $C_d$ : Pollutant concentration, NO<sub>x</sub> lb/scf  
 $\%O_2$ : Oxygen concentration in percent, measured on a dry basis  
 $F_d$ : Fuel specific F-factor, dscf/MMBtu  
 $Q_h$ : Fuel rate, scf/hr  
 $GCV$ : Heating value fuel, Btu/scf

To convert from ppmvd NO<sub>x</sub> to lb/scf NO<sub>x</sub>, multiply the ppmvd value by  $1.194 \times 10^{-7}$

To convert from ppmvd CO to lb/scf CO, multiply the ppmvd value by  $7.268 \times 10^{-8}$

### Mass Emission Calculations lb/hr

$$NO_{x \frac{lb}{hr}} = C_d \times F_d \times \frac{20.9}{20.9 - \%O_2} \times Q_h \times \frac{GCV}{10^6}$$

#### Where:

- $C_d$ : Pollutant concentration, lb/scf  
 $F_d$ : Fuel specific F-factor, dscf/MMBtu  
 $Q_h$ : Fuel flow, scf/hr  
 $\%O_2$ : Oxygen concentration in percent, measured on a dry basis



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

NO<sub>x</sub> Corrected to 15% O<sub>2</sub>

$$Em = NO \times \left( \frac{5.9}{20.9 - \% O_2} \right)$$

**Where:**

E<sub>m</sub>: 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

NO Interference Response

$$INO = \left[ \left( \frac{R_{NO-NO_2}}{C_{NO_2G}} \times \frac{C_{NO_2S}}{C_{NO_xS}} \right) \right] \times 100$$

**Where:**

I<sub>NO</sub>: NO interference response (%)

R<sub>NO-NO<sub>2</sub></sub>: NO response to NO<sub>2</sub> span gas (ppm NO)

C<sub>NO<sub>2</sub>G</sub>: Concentration of NO<sub>2</sub> span gas (ppm NO<sub>2</sub>)

C<sub>NO<sub>2</sub>S</sub>: Concentration of NO<sub>2</sub> in stack gas (ppm NO<sub>2</sub>)

C<sub>NO<sub>x</sub>S</sub>: Concentration of NO<sub>x</sub> in stack gas (ppm NO<sub>x</sub>)

VOC ppm

$$VOC_{ppmvd} = \frac{THC_{ppmvw} - \frac{1}{3}CH_4_{ppmvd} - \frac{2}{3}C_2H_6_{ppmvd}}{1 - \left( \frac{\% H_2O}{100} \right)}$$



VOC mass emissions calculations g/bhp-hr

$$VOC \frac{g}{bhp-hr} = C_d \times F_d \times \frac{20.9}{20.9 - \%O_2} \times Q_h \times \frac{GCV}{10^6} \times \frac{453.6}{BHP}$$

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

VOC mass emissions calculations lb/hr

$$VOC \frac{g}{bhp-hr} = C_d \times F_d \times \frac{20.9}{20.9 - \%O_2} \times Q_h \times \frac{GCV}{10^6}$$

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

To convert ppm to lb/scf	Multiply by
NOx	1.194x10 <sup>-7</sup>
VOC	1.1444x10 <sup>-7</sup>

GVC: Heating value of the fuel, Btu/scf





## 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 Generator APU at TC Energy's ANR Pipeline Company's Lincoln Compressor Station located in Lake George, MI. The testing was conducted on January 24, 2023.

During the course of the testing, the Generator APU conformed to the requirements of Code of Federal Regulations, Title 40, Part 60, Appendix A.

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

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



**A. FIELD TEST DATA**

Date	1/24/2023					
Client	TC Energy					
Location	Lincoln MI					
Test Location	Generator-APU					
Analyzer	Horiba PG-350		VIG	METHANE CUTTER		
Serial Number	3480D6F4	3480D6F4	3480D6F4	3480D6F4	3480D6F4	3480D6F4
Upscale Reponse	< 60	< 60	< 60	< 60	< 60	< 60
Downscale Response	< 60	< 60	< 60	< 60	< 60	< 60
CHANNEL LABEL	O2	Nox	CO	VOC	Wet O2	
ON=1 OFF=0	1	1	1	1	1	1
Min						<b>Bags</b>
	1	8.231	126.3			R1
	2		126.3			1329
	3	8.337	126.3			1330
	4		126.3			1330
	5	8.440	126.3			1331
	6		126.3			1330
	7		126.3			1330
	8		126.2			1331
	9		126.2			1331
	10		126.2			1331
	11		126.2			1330
	12		126.2			1330.3
	13		126.2			R2
	14		126.2			1293
	15		126.2			1293
	16		126.1			1293
	17		126.1			1293
	18		126.1			1294
	19		126.1			1294
	20		126.1			1293
	21		126.1			1293
	22		126			1293
	23		126			1293
	24		126			1293.2
	25		126			R3
	26		126			1213
	27		126			1212
	28		126			1213
	29		126			1213
	30		126			1212
	31					1213
	32					1213
	33					1213
	34					1213
	35					1212
	36					1212.7
	37					
	38					
	39					
	40					
	41					
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	44					
	45					
	46					
	47					
	48					
	49					
	50					
	51					
	52					
	53					
	54					
	55					
	56					
	57					
	58					
	59					
	60					

High 126.300  
Low 126.000  
Average  
Converter Percent 99.76%

Strat % 1 8.231 -1.25% Under 5% or .5 ppm  
Strat % 2 8.337 0.01% Single point  
Strat % 3 8.440 1.25%  
Average 8.34

Leak Check Pre Test Pass  
Leak Check Post Test Pass

Generator-APU

Calibration Gasses										
	Scale		High		Mid		Low		Zero	
O2	21.90	RN1467	21.90	QN0066	11.90					
Nox	515.90	LL197491	515.90	BR0013976	259.000					
CO	507.70	LL197491	507.70	BR0013976	255.00					
VOC	1490.00	RN1480	1490.00	BR0013976	745.000	LL197491	453.00			
Wet O2	21.90	RN1467	21.90	QN0066	11.90				BR0011147	0.00

Select Bias Gasses			
	High	Mid	Low
O2		1	
Nox		1	
CO		1	
VOC		1	
Wet O2		1	

Calibration Error Test								
	High		Mid		Low		Zero	
O2	21.90	21.92	0.1%	11.90	11.79	-0.5%	0.00	0.00
							0.00	0.0%
Nox	515.90	516.10	0.0%	259.00	258.00	-0.2%	0.00	0.0%
							1.00	0.2%
CO	507.70	508.00	0.1%	255.00	254.00	-0.2%	0.00	0.0%
							0.00	0.0%
							3.00	0.6%
VOC	1490.00	1493.00	0.2%	745.00	747.00	0.1%	453.00	-0.1%
							0.00	0.0%
							1.00	0.1%
Wet O2	21.90	21.93	0.1%	11.90	11.90	0.0%	0.00	0.0%
							0.00	0.0%

Beginning Bias Check 1						
	Span		Bias		Zero	
O2	11.79	11.94	0.7%	0.00	0.02	0.1%
Nox	258.00	257.00	-0.2%	1.00	3.00	0.4%
CO	254.00	249.00	-1.0%	3.00	6.00	0.6%
VOC	747.00	748.00	0.1%	1.00	2.50	0.1%
Wet O2	11.90	11.91	0.0%	0.00	0.03	0.1%

Ending Calibration Averages				
	High	Mid	Low	Zero
O2	21.92	11.79		0.00
Nox	516.10	258.00		1.00
CO	508.00	254.00		3.00
VOC	1493.00	747.00	451.00	1.00
Wet O2	21.93	11.90		0.00

Beginning Bias Averages		
	Span	Zero
O2	11.94	0.02
Nox	257.00	3.00
CO	249.00	6.00
VOC	748.00	2.50
Wet O2	11.91	0.03

Methane Cutter	
Response Test	0.00
Propane Cal Gas CC 318494	457

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Date 1/24/2023  
 Client TC Energy  
 Location Lincoln MI  
 Test Location Generator-APU  
 Run 1

Start Time	CHANEL LABEL	O2	Nox	CO	VOC	Wet O2	% Moisture	Actual Bias Gases		
								High	Mid	Low
10:45	1	8.23	93.04	25.59	1375.47	7.11	15.78	O2	11.90	
	2	8.22	94.25	21.46	1335.25	7.19	14.42	Nox	259.00	
	3	8.34	93.00	18.35	1416.83	7.40	12.71	CO	255.00	
	4	8.41	93.35	16.12	1301.41	7.50	12.21	VOC	745.00	
	5	8.44	87.03	14.80	1340.77	7.04	19.84	Wet O2	11.90	
	6	8.45	87.07	14.06	1321.93	7.20	17.45			
	7	8.48	86.82	14.37	1405.63	7.16	18.50			
	8	8.48	86.84	13.19	1343.84	7.05	20.29			
	9	8.46	87.43	13.06	1323.15	7.41	14.24			
	10	8.49	88.58	13.75	1322.73	7.01	21.14			
	11	8.48	86.42	12.77	1361.21	7.17	18.21			
	12	8.49	86.75	12.06	1317.12	7.44	14.06			
	13	8.49	89.30	11.87	1390.75	7.41	14.51			
	14	8.47	90.21	12.93	1397.26	7.47	13.45			
	15	8.47	90.27	12.53	1404.04	7.12	19.02			
	16	8.48	89.23	12.37	1329.22	7.04	20.45			
	17	8.46	89.86	12.27	1326.44	7.32	15.70			
	18	8.47	91.31	12.25	1372.24	7.23	17.28			
	19	8.49	91.94	12.40	1389.05	7.37	15.13			
	20	8.50	86.99	12.42	1373.43	7.19	18.27			
11:05	21	8.48	91.24	12.87	1408.55	7.36	15.16	VOC	748.00	3.00
	22	8.47	92.43	12.88	1307.37	7.49	13.15		750.00	0.1%
	23	8.47	91.39	12.76	1368.57	7.22	17.26		0.1%	0.2%
	24	8.49	90.06	12.91	1411.30	7.21	17.78		3.30	0.1%
	25	8.48	92.92	12.92	1397.78	7.03	20.70		0.03	0.0%
	26	8.49	88.22	12.93	1334.55	7.38	15.02	Wet O2	11.91	0.02
	27	8.49	88.84	12.81	1343.25	7.27	16.78		11.94	0.1%
	28	8.48	92.26	12.20	1395.39	7.28	16.82		0.2%	0.1%
	29	8.48	92.32	12.38	1345.97	7.27	16.63			
	30	8.49	89.01	12.39	1370.46	7.16	18.57			
	31	8.46	92.72	12.85	1317.39	7.02	20.46			
	32	8.49	87.14	12.73	1416.71	7.25	17.03			
	33	8.49	86.90	12.29	1342.35	7.17	18.42			
	34	8.47	90.60	12.30	1350.86	7.45	13.63			
	35	8.46	90.91	12.30	1319.32	7.46	13.39			
	36	8.47	89.83	12.74	1311.11	7.49	13.15			
	37	8.45	92.11	12.63	1337.02	7.34	15.16			
	38	8.48	87.06	11.88	1400.85	7.48	13.33			
	39	8.48	86.50	12.19	1351.61	7.47	13.56			
	40	8.46	91.58	12.20	1315.40	7.18	17.86			
41	8.47	88.20	13.11	1404.83	7.16	18.23				
42	8.46	90.46	12.21	1363.93	7.09	19.32				
43	8.48	88.77	12.21	1325.73	7.00	21.16				
44	8.47	91.30	12.22	1316.74	7.06	20.04				
45	8.46	91.58	12.81	1361.04	7.22	17.19				
46	8.45	92.42	12.53	1379.79	7.14	18.33				
47	8.46	91.01	12.88	1408.11	7.33	15.48				
48	8.48	91.57	12.09	1409.14	7.05	20.33				
49	8.48	89.31	12.54	1408.78	7.33	15.62				
50	8.48	89.03	12.09	1359.86	7.37	15.12				
51	8.47	89.32	12.40	1309.34	7.43	13.96				
52	8.48	90.73	12.86	1413.90	7.46	13.65				
53	8.46	92.14	13.00	1329.38	7.20	17.50				
54	8.47	87.91	12.69	1331.76	7.30	16.04				
55	8.46	90.17	12.10	1418.29	7.30	15.97				
56	8.44	91.58	11.96	1418.33	7.26	16.21				
57	8.46	87.63	12.10	1348.03	7.17	18.06				
58	8.45	89.04	11.65	1349.04	7.21	17.19				
59	8.46	91.57	11.34	1365.90	7.24	16.86				
60	8.44	90.71	11.22	1401.60	7.24	16.60				
	Average	8.459	89.819	13.455	1,362.05	7.26	16.66			
	Corrected Avg	8.42	87.67	8.28	1,357.15	7.23				

	Actual Bias Gases		
	High	Mid	Low
O2	11.90		
Nox	259.00		
CO	255.00		
VOC	745.00		
Wet O2	11.90		

	Ending Bias Check			1		
	Span	Drift	Bias	Zero	Drift	Bias
O2	11.94	0.1%	0.8%	0.02	0.0%	0.0%
Nox	257.00	0.6%	0.4%	3.00	0.2%	0.6%
CO	249.00	0.6%	-0.4%	6.00	-0.2%	0.4%
VOC	748.00	0.1%	0.2%	2.50	0.1%	0.2%
Wet O2	11.91	0.1%	0.2%	0.03	0.0%	0.1%

	Ending Bias Averages	
	span	zero
O2	11.96	0.01
Nox	260.00	4.00
CO	252.00	5.00
VOC	750.00	3.30
Wet O2	11.94	0.02

Date 1/24/2023  
 Client TC Energy  
 Location Lincoln MI  
 Test Location Generator-APU  
 Run 2

CHANEL LABEL	O2	Nox	CO	VOC	Wet O2	% Moisture
11:50	8.44	90.38	13.01	1318.34	7.07	19.33
2	8.48	87.85	12.42	1324.52	7.22	17.32
3	8.45	92.63	12.87	1303.09	7.05	19.84
4	8.45	91.79	13.78	1322.14	7.27	16.21
5	8.46	91.50	12.76	1323.04	7.36	14.86
6	8.47	92.35	11.83	1323.58	7.35	15.33
7	8.46	87.84	12.73	1358.91	7.31	15.83
8	8.46	89.24	12.28	1343.64	7.47	13.25
9	8.49	91.50	11.23	1357.04	7.47	13.64
10	8.48	88.96	11.38	1351.08	7.31	16.13
11	8.47	91.22	13.48	1303.83	7.50	13.00
12	8.46	88.68	13.51	1321.63	7.22	17.19
13	8.47	91.22	13.09	1364.00	7.02	20.60
14	8.46	93.75	13.37	1368.25	7.44	13.76
15	8.46	91.23	11.70	1368.93	7.22	17.18
16	8.47	89.82	12.75	1314.29	7.15	18.43
17	8.45	92.35	13.38	1368.05	7.35	14.97
18	8.48	90.38	11.84	1323.70	7.01	20.99
19	8.47	89.82	12.61	1329.65	7.43	14.07
20	8.48	90.67	12.30	1344.03	7.07	19.83
12:10	8.47	90.94	11.85	1337.95	7.21	17.49
22	8.46	93.47	12.31	1319.81	7.04	20.22
23	8.47	90.09	11.71	1358.86	7.02	20.63
24	8.47	89.25	12.17	1302.10	7.40	14.39
25	8.47	89.54	12.31	1360.73	7.02	20.62
26	8.50	92.08	11.86	1317.84	7.10	19.80
27	8.46	90.39	12.17	1345.93	7.25	16.65
28	8.47	88.99	12.18	1357.38	7.29	16.12
29	8.45	90.69	13.54	1368.87	7.42	13.88
30	8.45	91.26	12.32	1354.09	7.42	13.90
31	8.44	91.55	12.50	1350.22	7.46	13.07
32	8.47	91.84	12.04	1310.09	7.00	21.03
33	8.46	90.99	11.73	1348.79	7.42	14.07
34	8.46	93.25	11.42	1359.22	7.12	18.90
35	8.45	92.41	12.19	1345.05	7.21	17.11
36	8.45	94.38	12.36	1343.20	7.17	17.82
37	8.45	89.88	12.65	1327.85	7.27	16.38
38	8.45	91.30	12.82	1338.97	7.06	19.70
39	8.45	89.33	13.42	1324.31	7.01	20.58
40	8.46	91.02	12.82	1337.84	7.46	13.42
41	8.47	89.90	13.42	1359.54	7.34	15.45
42	8.47	89.89	11.74	1307.94	7.14	18.57
43	8.47	91.57	11.74	1320.18	7.26	16.66
44	8.47	89.88	11.74	1319.46	7.38	14.74
45	8.46	90.44	12.97	1311.03	7.24	16.80
46	8.53	90.71	12.20	1364.12	7.10	20.17
47	8.45	93.53	13.28	1335.46	7.30	15.83
48	8.47	94.10	12.37	1353.08	7.40	14.41
49	8.48	89.87	12.06	1364.51	7.05	20.34
50	8.50	87.90	12.97	1349.99	7.36	15.39
51	8.48	90.16	11.60	1348.43	7.46	13.72
52	8.45	92.13	11.46	1319.46	7.16	18.04
53	8.46	91.01	12.06	1316.76	7.28	16.33
54	8.46	89.04	12.21	1320.45	7.19	17.67
55	8.44	88.48	13.29	1345.72	7.39	14.22
56	8.45	95.52	12.84	1324.18	7.42	13.75
57	8.43	89.88	12.38	1323.32	7.36	14.67
58	8.43	92.42	12.84	1310.93	7.16	17.82
59	8.46	89.88	12.98	1305.12	7.04	20.06
60	8.43	93.82	13.30	1300.92	7.50	12.49
Average	8.463	90.933	12.47	1,335.69	7.25	16.74
Corrected Avg	8.39	87.92	6.65	1,325.00		

	Actual Bias Gases		
	High	Mid	Low
O2		11.90	
Nox		259.00	
CO		255.00	
VOC		745.00	
Wet O2		11.90	

Ending	Bias Check		Bias	Zero	Drift	Bias
	Span	Drift				
O2	11.96			0.01		
	12.00	0.2%	1.0%	0.07	0.3%	0.2%
Nox	260.00			4.00		
	259.00	-0.2%	0.2%	4.60	0.1%	0.3%
CO	252.00			5.00		
	256.00	0.8%	0.4%	7.00	0.4%	0.2%
VOC	750.00			3.30		
	756.00	0.4%	0.6%	5.80	0.2%	0.2%
Wet O2	11.84			0.02		
	11.97	0.1%	0.3%	0.05	0.1%	0.1%

Ending Bias Averages	
span	zero
O2 <input type="text" value="12.00"/>	<input type="text" value="0.07"/>
Nox <input type="text" value="259.00"/>	<input type="text" value="4.60"/>
CO <input type="text" value="256.00"/>	<input type="text" value="7.00"/>
VOC <input type="text" value="756.00"/>	<input type="text" value="5.80"/>
Wet O2 <input type="text" value="11.97"/>	<input type="text" value="0.05"/>

Date 1/24/2023  
 Client TC Energy  
 Location Lincoln MI  
 Test Location Generator-APU  
 Run 3

Start Time	CHANEL LABEL	O2	Nox	CO	VOC	Wet O2	5 Moisture	Actual Bias Gasses						
								High	Mid	Low				
12:56	1	8.42	91.03	13.62	1280.63	7.39	13.92	O2	11.90					
	2	8.44	91.31	13.76	1277.85	7.29	15.77	Nox	259.00					
	3	8.48	89.06	12.08	1303.97	7.49	13.27	CO	255.00					
	4	8.48	88.78	11.94	1258.18	7.31	15.96	VOC	745.00					
	5	8.44	93.00	11.94	1264.07	7.08	19.31	Wet O2	11.80					
	6	8.46	88.50	12.57	1317.50	7.07	19.72							
	7	8.49	90.47	11.94	1274.41	7.27	16.70	Ending						
	8	8.47	90.47	12.54	1281.21	7.31	15.99	Bias Check	3					
	9	8.47	89.62	11.49	1275.59	7.47	13.42	Span						
	10	8.44	95.25	12.72	1278.52	7.37	14.44	O2	12.00	0.07				
	11	8.44	93.00	13.32	1295.87	7.36	14.61		11.98	-0.1%	0.9%	0.09		
	12	8.48	88.48	12.09	1283.59	7.08	19.67						0.1%	0.3%
	13	8.45	92.71	12.86	1272.88	7.09	19.24	Nox	259.00	4.60				
	14	8.49	93.55	12.40	1270.56	7.45	13.98		263.10	5.50	0.2%			0.5%
	15	8.47	89.89	12.09	1305.77	7.38	14.70							
	16	8.48	88.76	11.63	1278.15	7.48	13.35							
	17	8.47	88.20	12.40	1304.47	7.40	14.44	CO	256.00	7.00				
	18	8.45	91.58	13.17	1266.56	7.13	18.51		257.00	7.70	0.1%			0.3%
	19	8.46	90.45	12.86	1254.14	7.01	20.63							
	20	8.46	88.77	13.31	1254.43	7.39	14.41							
	21	8.49	90.74	12.25	1285.24	7.08	19.89	VOC	756.00	5.80				
	22	8.48	92.15	11.94	1256.16	7.48	13.34		770.00	6.30	0.0%			0.3%
	23	8.47	91.60	12.40	1298.79	7.15	18.50							
	24	8.46	91.60	12.71	1265.77	7.30	15.77							
	25	8.46	89.35	13.63	1316.30	7.07	19.68	Wet O2	11.97	0.05				
	26	8.46	91.89	12.71	1283.46	7.36	14.97		11.95	-0.1%	0.2%	0.08	0.1%	0.2%
	27	8.48	91.04	11.80	1317.02	7.06	20.11							
	28	8.47	92.73	12.26	1267.98	7.06	19.98							
	29	8.47	91.32	12.40	1270.66	7.23	17.07							
	30	8.50	85.68	11.94	1293.82	7.37	15.36							
	31	8.48	92.44	12.40	1299.46	7.34	15.64	Ending Bias Averages						
	32	8.50	88.77	11.80	1255.74	7.13	19.18		span	zero				
	33	8.49	89.33	11.48	1280.67	7.49	13.39		O2	11.98				0.09
	34	8.47	92.70	12.25	1273.48	7.18	18.10							
	35	8.48	87.91	12.40	1301.63	7.41	14.58		Nox	263.10				5.50
	36	8.47	91.29	12.25	1272.21	7.40	14.35							
	37	8.45	95.24	13.03	1254.30	7.09	19.13		CO	257.00				7.70
	38	8.50	90.46	11.34	1261.45	7.07	20.19							
	39	8.46	91.31	12.26	1291.15	7.08	19.51		VOC	770.00				6.30
	40	8.44	91.60	13.48	1281.33	7.17	17.76							
	41	8.48	88.51	13.17	1318.36	7.16	18.46		Wet O2	11.95				0.08
	42	8.47	93.59	13.17	1252.43	7.48	13.21							
	43	8.50	89.09	11.80	1281.85	7.25	17.21							
	44	8.48	88.25	12.72	1277.48	7.04	20.40							
	45	8.48	92.21	12.57	1259.81	7.34	15.50							
	46	8.48	91.08	11.80	1312.38	7.35	15.41							
	47	8.47	90.25	13.35	1271.86	7.41	14.18							
	48	8.47	90.81	13.04	1285.15	7.26	16.64							
	49	8.50	90.82	12.58	1279.29	7.17	18.46							
	50	8.49	93.38	12.27	1293.13	7.20	17.83							
	51	8.50	89.15	11.81	1305.60	7.13	19.19							
	52	8.48	88.60	13.04	1313.55	7.47	13.55							
	53	8.48	91.71	12.13	1258.29	7.18	17.97							
	54	8.47	90.02	12.59	1253.59	7.22	17.31							
	55	8.47	92.01	12.73	1254.63	7.33	15.63							
	56	8.49	90.04	11.67	1273.03	7.29	16.56							
	57	8.47	88.35	12.27	1254.33	7.11	19.25							
	58	8.48	88.92	13.05	1276.18	7.41	14.56							
	59	8.49	88.36	12.13	1274.01	7.47	13.65							
	60	8.48	90.34	12.28	1255.17	7.35	15.32							
	Average	8.472	90.626	12.46	1,279.59	7.27								16.65
	Corrected Avg	8.39	86.58	5.23	1,253.43	7.20								

**REVIEWED**  
 By Anova Frasure at 2:48 pm, Feb 03, 2023





**LOAD  
BANK TEST**

**ENGINE DIVISION  
1-800-833-1789**

CUSTOMER NAME Environmental Quality Management											W.O. # RF-WO-1439168	
GENERATOR SET LOCATION Lake Gorge			UNIT.		CONTACT Karol Mast				TELEPHONE NO. 219-776-6056			
ENGINE MODEL G3412C		SERIAL NO. SPP00267				START		163	END	167		
GENERATOR MODEL D150		SERIAL NO. & SPEC NO. SPY00266			KW RATING 500		VOLTS 480		SERVICE LEVEL			
GENERATOR PACKAGE NUMBER		SERIAL NO.			TIME START 10:45 A.M			END 12:45 P.M		DATE 1/24/2023		
			<b>VOLTS</b>			<b>AMPS</b>						
<b>TIME</b>	<b>Hz</b>	<b>KW</b>	<b>A</b>	<b>B</b>	<b>C</b>	<b>A</b>	<b>B</b>	<b>C</b>	<b>OIL PRESS</b>	<b>COOLANT TEMP</b>	<b>AMBIENT TEMP</b>	<b>% LOAD</b>
0	59	455	479	479	478	550	548	547	71	192	27	91%
0.5	59	454	479	479	478	549	549	546	64	192	27	91%
1	59	455	479	479	478	550	549	547	64	192	27	91%
1.5	59	454	479	478	478	549	549	547	64	192	27	91%
2	59	454	479	478	478	549	549	547	64	192	34	91%
2.5		455	480	479	478	550	549	547	64	192	34	91%
3		455	480	479	478	549	549	547	64	192	34	91%
3.5		456	480	480	478	550	549	547	64	192	34	91%
4		0										0%
4.5		0										0%
5		0										0%
5.5		0										0%
6		0										0%
6.5		0										0%
7		0										0%
7.5		0										0%
8		0										0%
COMMENTS, RECOMMENDATIONS												
Load engine to 91-92% load while performing emission test.												
SERVICE TECHNICIAN		Kevin Curtiss			DATE		####		CUSTOMER REPRESENTATIVE			





## **B. PROCESS OPERATING DATA**

TC Lincoln MI

1 24 23

1046

B1

KW's 453

Baro 28.904

KW's 453

PSI 14.195

KW's 453

AT 29

KW's 453

BH 91

B2<sup>1150</sup>

KW's 453

Baro 28.891

KW's 453

PSI 14.189

KW's 453

AT 33

KW's 453

BH 79

B3

KW's 453

Baro 28.874

KW's 453

PSI 14.181

KW's 453

AT 33

KW's 453

BH 76



### **C. GAS CERTIFICATIONS**



TIER 5 LABS  
5353 W. SOUTHERN AVE.  
INDIANAPOLIS, IN 46241  
317-536-5590

Cylinder Number:	RN1467	Certification Date:	08 January 2020
Mixture Grade:	EPA Protocol Standard Gas Mixture	Expiration Date:	08 January 2028
Certificate Number:	3659A-05T5-C01	Lot Number:	3659A-05T5
Cylinder Fill Pressure:	2216 PSIG	Customer Part Number:	T5E 4800001-A8-1

Do not use below 100 psi (0.7 megapascals)

EPA Traceability Protocol for Gaseous Calibration Standards Procedure G2, EPA/600/R-12/531 May 2012

### Certified Concentrations

Component	Concentration	Uncertainty	Assay Dates
Carbon Dioxide	18.0%	+/- 0.10% (absolute)	1/8/2020
Oxygen	21.9%	+/- 0.10% (absolute)	1/8/2020
Nitrogen	Balance		

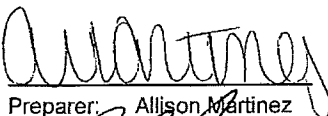
### Analytical Instrumentation

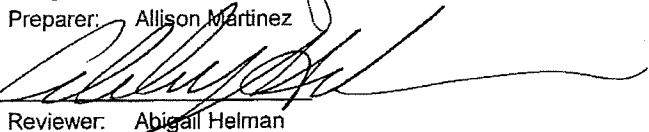
Component	Analytical Principle	Make	Model	Serial	MPC Date
Carbon Dioxide	GC-TCD	Shimadzu	GC-8A	C10495021497SA	12/27/2019
Oxygen	GC-TCD	Shimadzu	GC-8A	C10495021497SA	12/12/2019

### Reference Standards

Serial Number	Lot	Expiration	Type	Component	Balance	Concentration	Uncertainty (%)	NIST Reference
D685003	VSL	3/15/2024	PRM	CO2	N2	18.00%	0.018	VSL
D685109	VSL	9/14/2023	PRM	O2	N2	21.00%	0.100	VSL

The calibration results published in this certificate were obtained using equipment and standards capable of producing results that are traceable to National Institute of Standards and Technology (NIST) and through NIST to the International System of Units (SI). The expanded uncertainties, if included on this certificate, use a coverage factor of k=2 to approximate the 95% confidence level of the measurement, unless otherwise noted. If uncertainties are not included on this certificate, they are available upon request. The nitrogen used as a component or balance gas as well as the oxygen used in air mixtures meets the requirements set forth in EPA 1065.750. This calibration certificate applies only to the item described and shall not be reproduced other than in full, without written approval from the calibration facility. Calibration certificates without signatures are not valid. This calibration meets the requirements of ISO/IEC 17025-2005

  
Preparer: Allison Martinez

  
Reviewer: Abigail Helman

Production Laboratory:  
Tier 5 Labs, LLC  
5353 W. Southern Ave.  
Indianapolis, IN 46241  
PGVP Vendor ID R12020



Cylinder Number:	QN0066	Certification Date:	9/19/2022
Mixture Grade:	EPA Protocol Calibration Gas 1	Issuance Date:	9/21/2022
Certificate Number:	25222C-04T5-C03	Expiration Date:	9/19/2030
Final Pressure:	2215 PSIG	Batch Number:	25222C-04T5
		Part Number:	T5E 4800001-A8-2

Do not use below 100 psi (0.7 megapascals)  
EPA Traceability Protocol for Gaseous Calibration Standards Procedure G1, EPA/600/R-12/531 May 2012

### Certified Concentrations

Component	Concentration	Analytical Uncertainty		Assay Dates
Carbon Dioxide	10.1%	0.1%	Absolute	9/16/2022
Oxygen	11.9%	0.1%	Absolute	9/19/2022
Nitrogen	Balance			

### Analytical Instrumentation


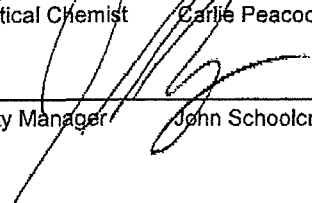
Component	Analytical Principle	Make	Model	Serial	MPC Date
Carbon Dioxide	NDIR	Servomex	4100	900033	9/13/2022
Oxygen	GC-TCD	Shimadzu	GC-8A	C10495021497SA	9/12/2022

### Reference Standards

Serial Number	Lot	Expiration	Type	Component	Balance	Concentration	Units	Uncertainty	Reference
CC466360	2287A-05T5	1/28/2028	GMIS	CO2	N2	16.17	%	0.156	VSL
CC478959	0716A-01T5	2/19/2028	GMIS	O2	N2	20.87	%	0.113	VSL

Cylinder serial numbers in this batch: BR0013997 BR0013996 QN0066 TN10460

The calibration results published in this certificate were obtained using equipment and standards capable of producing results that are traceable to National Institute of Standards and Technology (NIST) and through NIST to the International System of Units (SI). The expanded uncertainties, if included on this certificate, use a coverage factor of k=2 to approximate the 95% confidence level of the measurement, unless otherwise noted. If uncertainties are not included on this certificate, they are available upon request. The nitrogen used as a component or balance gas as well as the oxygen used in air mixtures meets the requirements set forth in 40CFR1065.750. This calibration certificate applies only to the item described and shall not be reproduced other than in full, without written approval from the calibration facility. Calibration certificates without signatures are not valid. This calibration meets the requirements of ISO/IEC 17025-2017.

  
 Analytical Chemist Carlie Peacock  
  
 Facility Manager John Schoolcraft

Production Laboratory:  
 Tier 5 Labs  
 PGVP Vendor ID R12022  
 5353 W Southern Ave  
 Indianapolis, IN 46241



Cylinder Number:	RN1480	
Mixture Grade:	EPA Protocol Calibration Gas 2	
Certificate Number:	23621A-02T5-C01	
Final Pressure:	2015	PSIG

Certification Date:	9/15/2021
Issuance Date:	9/15/2021
Expiration Date:	9/15/2029
Batch Number:	23621A-02T5
Part Number:	T5E 67M0001-A8-3

Do not use below 100 psi (0.7 megapascals)  
EPA Traceability Protocol for Gaseous Calibration Standards Procedure G2, EPA/600/R-12/531 May 2012

### Certified Concentrations

Component	Concentration	Analytical Uncertainty		Assay Dates
Carbon Monoxide	994 ppm	2 PPM	Absolute	9/2/2021
Methane	1490 ppm	10 ppm	Absolute	8/31/2021
Nitric Oxide	982 ppm	2 ppm	Absolute	8/30/2021, 9/8/2021, 9/15/2021
Nitrogen	Balance			

### Analytical Instrumentation



Component	Analytical Principle	Make	Model	Serial	MPC Date
Carbon Monoxide	NDIR	Horiba	VA-3111	PC062W1E	8/24/2021
Methane	GC-TCD/FID	Shimadzu	GC-2014	C11945605925	8/31/2021
Nitric Oxide	Chemiluminescence	Thermo	42i-HL	1101346887	9/10/2021

### Reference Standards

Serial Number	Lot	Expiration	Type	Component	Balance	Concentration	Units	Uncertainty	Reference
EB0047969	3378A-03T5	4/2/2028	GMIS	CO	N2	970.96	PPM	0.261	2637a
D791204	VSL	1/7/2025	VSL	CH4	N2	1	%	0.2	VSL
D791257	VSL	1/8/2025	VSL	NO	N2	1501.7	PPM	0.2	VSL

NOx = 992 PPM REFERENCE STANDARD ONLY

The calibration results published in this certificate were obtained using equipment and standards capable of producing results that are traceable to National Institute of Standards and Technology (NIST) and through NIST to the International System of Units (SI). The expanded uncertainties, if included on this certificate, use a coverage factor of k=2 to approximate the 95% confidence level of the measurement, unless otherwise noted. If uncertainties are not included on this certificate, they are available upon request. The nitrogen used as a component or balance gas as well as the oxygen used in air mixtures meets the requirements set forth in 40CFR1065.750. This calibration certificate applies only to the item described and shall not be reproduced other than in full, without written approval from the calibration facility. Calibration certificates without signatures are not valid. This calibration meets the requirements of ISO/IEC 17025-2017.

  
 Analytical Chemist Carlie Peakcock  
  
 Quality Manager Allison Martinez

Production Laboratory:  
 Tier 5 Labs  
 PGVP Vendor ID R12021  
 5353 W Southern Ave  
 Indianapolis, IN 46241





**GASES &  
WELDING SUPPLIES**

**Certificate of Analysis – EPA Protocol Gas**

Customer:  
American Welding & Gas  
5353 W Southern Ave  
Indianapolis, IN 46241

PO Number: 435242  
Reference#: CGS-10-24984 (2 of 5)  
Date Filled: 7/19/2022  
Customer Part #: CSG E76M001-A8-1

Cylinder Number	Size	Concentration Basis	Standard type	Certificate ID
LL197491	ALQ	Mole	EPA Protocol	05-08172201

**Certified Concentration**

Carbon Monoxide = 507.7 ppm +/- 3.8 ppm  
Nitric Oxide = 510.5 ppm +/- 6.6 ppm  
NOx = 515.9 ppm  
Methane = 453.0 ppm +/- 4.1 ppm  
Nitrogen = Balance Gas

**Analytical Information**

Component	Analyzer Make/Model/SN	Analytical Principle	Last Calibration Date
Carbon Monoxide	Thermo Nicolet 6700 APW100179	FT-IR	7/11/2022
Nitric Oxide	Thermo Nicolet 6700 APW100179	FT-IR	8/8/2022
Methane	Thermo Nicolet 6700 APW100179	FT-IR	8/5/2022

First Assay Date 8/9/2022

Second Assay Date 8/17/2022

**Reference Standard(s)**

Component	GMIS #	Cylinder #	Concentration	Uncertainty	Expiration Date
Carbon Monoxide	10-17515	CC482675	501.2 ppm	+/- 3.8 ppm	11/15/2025
Nitric Oxide	10-17553	CC337204	483.0 ppm	+/- 4.9 ppm	11/13/2022
NOx	10-17553	CC337204	485.2 ppm		11/13/2022
Methane	10-22906-7	E80001615	599.9 ppm	+/- 2.0 ppm	3/17/2030
Nitrogen			Balance Gas		

CO, NO, and CH4 GMIS's certified by:

Component	SRM #	N.I.S.T. Sample #	Cylinder #	Concentration	Uncertainty	Expiration Date
Carbon Monoxide	1680b	2-J-46	CAL017898	490.4 ppm	+/- 2.0 ppm	9/20/2021
Nitric Oxide	1686b	42-M-40	CAL017952	493.1 ppm	+/- 2.2 ppm	4/6/2023
Nitrogen Oxides (NOx)	1680b	42-M-40	CAL017952	493.7 ppm	+/- 2.3 ppm	4/6/2023
Methane	PRM		D970443	600.6 ppm	+/- 1.8 ppm	9/15/2026
Nitrogen				Balance Gas		

This calibration standard has been certified per the 2012 EPA Traceability Protocol, Document EPA 600/R-12/531, using the procedure G1.

Do Not Use This Standard Below 100 psig (0.7 Megapascals).

Valve Outlet Connection CGA: 660  
Max Pressure (psig) @ 76F: 1700  
Certification Date: 8/17/2022  
Shelf Life: 3 YEARS  
Expiration date: 8/17/2025

Certified By: *Kelley Noy*

Reviewed By: *Derek Hundman*

Produced By:  
Coastal Specialty Gas: (409) 981-7760  
2150 Interstate 10 East, Beaumont, TX 77703  
Coastal Specialty Gas PGVP Vendor ID: 012022



### Certificate of Analysis – EPA Protocol Gas

**Customer:**  
 American Welding & Gas  
 5353 W Southern Ave  
 Indianapolis, IN 46241

**PO Number:** 436242  
**Reference#:** CGS-10-24064 (3 of 5)  
**Date Filled:** 7/19/2022  
**Customer Part #:** CGS EGM7001-A9-1

Cylinder Number	Size	Concentration Basis	Standard type	Certificate ID
BR0013976	ALQ	Mole	EPA Protocol	05-09152201

#### Certified Concentration

Carbon Monoxide =	255 ppm	+/- 1.6 ppm
Nitric Oxide =	258 ppm	+/- 1.4 ppm
NOx =	259 ppm	
Methane =	745 ppm	+/- 2 ppm
Nitrogen =	Balance Gas	

#### Analytical Information

Component	Analyzer Make/Model/SN	Analytical Principle	Last Calibration Date
Carbon Monoxide	MKS 2031DJG2EKVS13T 017146467	FT-IR	8/3/2022
Nitric Oxide	Thermo 42i-HL 1192604297	Chemiluminescence	7/25/2022
Nitric Oxide	Thermo 42i-HL 1152610017	Chemiluminescence	8/9/2022
Methane	MKS 2031DJG2EKVS13T 017146467	FT-IR	8/8/2022

**First Assay Date** 8/8/2022

**Second Assay Date** 8/15/2022

#### Reference Standard(s)

Component	GMIS #	Cylinder #	N.I.S.T. Reference	Concentration	Uncertainty	Expiration Date
Carbon Monoxide	CC734707.20200508	CC734707	SRM 1681b	705 ppm	+/- 2.8 ppm	11/9/2029
Carbon Monoxide	EB0026553.20191025	EB0026553	SRM 1680b	347 ppm	+/- 1.2 ppm	4/28/2028
Nitric Oxide	ALM047128.20211021	ALM047128	SRM 1687b	285 ppm	+/- 1.5 ppm	3/22/2030
Nitric Oxide	ALM066143.20211021	ALM066143	SRM 1687b	284 ppm	+/- 1.5 ppm	6/8/2030
Methane	EB0011684.20190103	EB0011684	SRM 2751	95.0 ppm	+/- 0.2 ppm	1/11/2028
Nitrogen				Balance Gas		

This calibration standard has been certified per the May 2012 EPA Traceability Protocol, Document EPA-600/R-12/531, using procedure G2.

Do Not Use This Standard Below 100 psig (0.7 Megapascals).

Valve Outlet Connection CIDA 860  
 Max Pressure (psig) @ 70°F 1900  
 Certification Date 8/15/2022  
 Shelf Life 3 years  
 Expiration date 8/13/2030

Certified By: *Kelley May*

Reviewed By: *John Sef*

Produced By:  
 Red Ball Technical Gas Service: (800) 551-8100  
 555 Craig Kennedy Way, Shreveport, LA 71107  
 PGVP Vendor ID: G12622



AMERICAN WELDING AND GAS  
 3977 W. 83RD PL.  
 MERRILLVILLE, IN 46410  
 219-750-9851

Product:	Nitrogen CEM	Minimum Purity:	99.9995%
Mixture Grade:	5.5	Certification Date:	08 May 2019
		Expiration Date:	09 May 2027
		Lot Number:	1289C-02T5
Cylinder Fill Pressure:	2216 PSIG	Customer Part Number:	NI 80CEM

Do not use below 100 psi (0.7 megapascals)

### Purity Specification

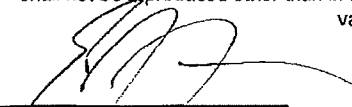
Analyte	Concentration	Assay Dates
Oxygen	< 0.67 PPM	5/8/2019
Molsture	< 0.375 PPM	5/8/2019
Total Hydrocarbons	< 0.05 PPM	5/8/2019
Total NOx	< 0.02 PPM	5/8/2019
Nitrous Oxide	< 0.02 PPM	5/8/2019
Carbon Monoxide	< 1 PPM	5/8/2019
Carbon Dioxide	< 10 PPM	

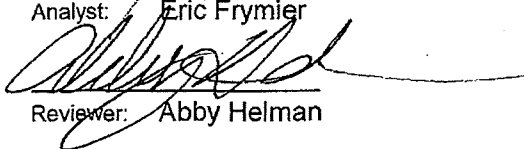
### Cylinders in Lot

BR0011147	LL191154	LL20486
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40 CFR1065.750 Compliant

The calibration results published in this certificate were obtained using equipment and standards capable of producing results that are traceable to National Institute of Standards and Technology (NIST) and through NIST to the International System of Units (SI). The expanded uncertainties, if included on this certificate, use a coverage factor of k=2 to approximate the 95% confidence level of the measurement, unless otherwise noted. If uncertainties are not included on this certificate, they are available upon request. This calibration certificate applies only to the item described and shall not be reproduced other than in full, without written approval from the calibration facility. Calibration certificates without signatures are not valid. This calibration meets the requirements of ISO/IEC 17025-2005

Analyst:   
 Eric Frymier

Reviewer:   
 Abby Helman

Production Laboratory:  
 Tier 5 Labs, LLC  
 5353W. Southern Ave.  
 Indianapolis, IN 46241  
 PGVP Vendor ID R12019

DocNumber: 299856



Praxair Distribution, Inc.  
6055 Brent Drive  
Toledo OH 43611  
Tel: +1 (419) 729-7732  
Fax: +1 (419) 729-2411  
PGVP ID: F12020

**CERTIFICATE OF ANALYSIS / EPA PROTOCOL GAS**

**Customer & Order Information**

PRAXAIR PKG CINCINNATI OH HP  
8376 READING RD  
CINCINNATI OH 45237-1407

Certificate Issuance Date: 02/17/2020

Praxair Order Number: 71235316

Part Number: AI PR450E-AS

Customer PO Number: 79223913

Fill Date: 01/30/2020

Lot Number: 700010030GB

Cylinder Style & Outlet: AS CGA 590

Cylinder Pressure and Volume: 2000 psig 140 ft3

**Certified Concentration**

Expiration Date:	02/14/2028	NIST Traceable
Cylinder Number:	CC318494	Expanded Uncertainty
457 ppm	Propane	± 4 ppm
Balance	Air	

**ProSpec EZ Cert**



**For Reference Only:** Oxygen 20.8 %

**Certification Information:** Certification Date: 02/14/2020 Term: 96 Months Expiration Date: 02/14/2028

This cylinder was certified according to the 2012 EPA Traceability Protocol, Document #EPA-600/R-12/531, using Procedure G1. Uncertainty above is expressed as absolute expanded uncertainty at a level of confidence of approximately 95% with a coverage factor k = 2. Do Not Use this Standard if Pressure is less than 100 PSIG.

**Analytical Data:**

(R=Reference Standard, Z=Zero Gas, C=Gas Candidate)

1. Component: Propane

Requested Concentration: 450 ppm  
Certified Concentration: 457 ppm  
Instrument Used: MKS 2030  
Analytical Method: FTIR  
Last Multipoint Calibration: 01/27/2020

Reference Standard: Type / Cylinder #: GMIS / CC239388

Concentration / Uncertainty: 1017 ppm ±7 ppm

Expiration Date: 05/25/2024

Traceable to: SRM # / Sample # / Cylinder #: 2646a / 103-C-40 / XF000887B

SRM Concentration / Uncertainty: 979.1 PPM / ±6.6 ppm

SRM Expiration Date: 03/04/2019

First Analysis Data:				Date
Z: 0	R: 1008	C: 454	Conc: 458	02/14/2020
R: 1008	Z: 0	C: 453	Conc: 457	
Z: 0	C: 453	R: 1008	Conc: 457	
UOM: ppm			Mean Test Assay: 457	ppm

Second Analysis Data:				Date
Z: 0	R: 0	C: 0	Conc: 0	
R: 0	Z: 0	C: 0	Conc: 0	
Z: 0	C: 0	R: 0	Conc: 0	
UOM: ppm			Mean Test Assay:	ppm

Analyzed By Mike Monnette

Certified By Edward E Zucal



#### **D. SAMPLE CALCULATIONS**

NOx Gaseous Emissions Example Calculations

Client TC Lincoln CS Run 1 Test Time 10:45 A.M.  
 Unit Generator APU Test Date 1/24/2023  
 Load 100%

Sample Train Data

Reference Temperature, °R	528	T <sub>ref</sub> = (°F plus 460)		
Concentration of gaseous species, ppmvd	87.67	C		
Molecular weight of gaseous species, lb/lb mole	46.01	MW <sub>s</sub>	MW <sub>s</sub> =	28.01 for CO
Stack O <sub>2</sub> % volume dry	8.42	O <sub>2</sub>		46.01 for NOx 64.06 for SOx

ppm @ 15% O2

Reported	41.45
Example	41.45
% Difference	0.01

Kilowatts	453	kW
Grams in a pound	453.592	
Specific molar volume of an ideal gas at standard conditions, ft <sup>3</sup> /lb mole	385.3	SV

Gaseous Emissions

a. Concentration, ppm @ 15% O2 dry

$$\begin{aligned}
 C_3 &= (C) \left[ \frac{(20.9 - 15.0)}{(20.9 - \% O_2)} \right] \\
 C_3 &= 87.67 \left[ \frac{(20.9 - 15.0)}{12.48} \right] \\
 C_3 &= 41.45 \text{ ppm @ 15\% O2}
 \end{aligned}$$

CO Gaseous Emissions Example Calculations

Client TC Lincoln CS Run 1 Test Time 10:45 A.M.  
 Unit Generator APU Test Date 1/24/2023  
 Load 100%

Sample Train Data

Reference Temperature, °R	528	T <sub>ref</sub> = (°F plus 460)			ppm @ 15% O <sub>2</sub>
Concentration of gaseous species, ppmvd	8.28	C			Reported 3.91
Molecular weight of gaseous species, lb/lb mole	28.08	MW <sub>s</sub>	MW <sub>s</sub> =	28.01 for CO	Example 3.91
Stack O <sub>2</sub> % volume dry	8.42	O <sub>2</sub>		46.01 for NO <sub>x</sub>	% Difference 0.00
				64.06 for SO <sub>x</sub>	

Kilowatts	453	kW
Grams in a pound	453.592	
conditions, ft <sup>3</sup> /lb mole	385.3	SV

Gaseous Emissions

a. Concentration, ppm @ 15% O<sub>2</sub> dry

$$\begin{aligned}
 C_3 &= (C) \left[ \frac{(20.9 - 15.0)}{(20.9 - \% O_2)} \right] \\
 C_3 &= 8.28 \left[ \frac{(20.9 - 15.0)}{12.48} \right] \\
 C_3 &= 3.91 \text{ ppm @ 15\% O}_2
 \end{aligned}$$

VOC Gaseous Emissions Example Calculations

Client TC Lincoln CS Run 1 Test Time 10:45 A.M.  
 Unit Generator APU Test Date 1/24/2023  
 Load 100%

Sample Train Data

Reference Temperature, °R	528	T <sub>ref</sub> = (°F plus 460)		
Concentration of gaseous species, ppmvd	84.32	C		
Molecular weight of gaseous species, lb/lb mole	44.1	MW <sub>s</sub>	MW <sub>s</sub> =	28.01 for CO
Stack O <sub>2</sub> % volume dry	8.42	O <sub>2</sub>		46.01 fo NOx 64.06 for SOx
Kilowatts	453	kW		44.1 C3H8
Grams in a pound	453.592			16.04 for CH <sub>4</sub>

	ppm @ 15% O <sub>2</sub>
Reported	39.86
Example	39.86
% Difference	-0.01

Gaseous Emissions

a. Concentration, ppm @ 15% O<sub>2</sub> dry

$$C_3 = (C) \left[ \frac{(20.9 - 15.0)}{(20.9 - \% O_2)} \right]$$

$$C_3 = 84.32 \left[ \frac{(20.9 - 15.0)}{12.48} \right]$$

$$C_3 = 39.86 \text{ ppm @ 15\% O}_2$$





## **E. CORRESPONDENCE**



**EMISSION TEST PLAN DOCUMENTATION**

Air Quality Test Plan Submittal Form



MICHIGAN DEPARTMENT OF ENVIRONMENT, GREAT LAKES, AND ENERGY

This form is for facilities and/or testing companies to submit test plans to the Michigan Department of Environment, Great Lakes, and Energy's (EGLE), Air Quality Division. Once submitted, the information will be automatically shared with the AQD District Office and Technical Programs Unit staff. If you have questions about this form or your submittal, please contact Jeremy Howe at [HoweJ1@Michigan.gov](mailto:HoweJ1@Michigan.gov) or 231-878-6687.

Facility Information

Facility Name\*

State Registration Number (SRN)\*

Where will the test take place?

Address\*

City\*

ZIP Code\*

County\*

EGLE District:

Bay City District

This is based on the county you select. This helps your submittal form get to the right people.

**Facility Contact Person\***

Pedro Amieva

**Facility Contact Email\***

Pedro\_Amieva@tcenergy.com

**Facility Contact Phone Number\***

832 320-5839

**Test Company Information**

**Test Company Name\***

Environmental Quality Management, Inc.

**Test Company Contact Person\***

Karl Mast

**Test Company Contact Email\***


kmast@eqm.com

**Test Company Contact Phone Number\***

219 776-6056

**Test Details**

**Test Start Date\***

 1/24/2023

**Permit Number (PTI or ROP)\***

If no permit, state "No Permit"

ROP-N5586-2019

**What Emission Unit(s)/Flexible Group(s) ID (List all) will be tested?\***

---

**COMPLIANCE TEST REPORT  
ANR PIPELINE-LINCOLN COMPRESSOR STATION  
EMERGENCY GENERATOR APU**

---

January 24, 2023

Prepared for:



TC Energy's ANR Pipeline Company  
Lake George, MI

Prepared by:



Environmental Quality Management, Inc.  
1280 Arrowhead Court  
Suite 2  
Crown Point, IN 46307  
(219) 661-9900  
[www.eqm.com](http://www.eqm.com)

PN: 050816.0004

February 2023

---





## PREFACE

I, Karl Mast, do hereby certify that the source emissions testing conducted at TC Energy in Lake George, 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.

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 ANR Pipeline's Lincoln Compressor Station in Lake George, MI.

Karl Mast  
Test Supervisor

**SUMMARY**

The compliance testing was performed on the Caterpillar 3412C natural gas fired Generator labeled Emergency Engine (APU) in accordance with the requirements of Permit # ROP-N5586-2019 in order to comply with Title 40, Code of Federal Regulations, Part 60, Subpart JJJJ. The results of the testing are detailed in the following tables.

<b>APU-Summary Results</b>						
Measured Unit	Run 1	Run 2	Run 3	Average	Permit Limit	Pass/Fail
NOx ppmvd @15% O <sub>2</sub>	41.45	41.47	40.83	41.25	160	Pass
CO ppmvd @ 15% O <sub>2</sub>	3.91	3.14	2.47	3.17	540	Pass
VOC ppmvd @ 15% O <sub>2</sub>	39.86	39.87	39.21	39.65	86	Pass





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Summary ..... iii

1 Introduction ..... 1

2 Test Results Summary..... 3

3 Facility and Process Conditions..... 5

4 Test Procedures ..... 7

5 Quality Assurance Procedures ..... 12

6 Conclusions ..... 13

**TABLES**

1 Generator APU2 Test Results Summary..... 3

2 Generator APU2 Operating & Ambient Conditions, Concentrations, & Emissions ..... 4

3 Generator APU2 Production Data ..... 5

**FIGURES**

1 Sampling Schematic ..... 6

**APPENDICES**

- A – Field Test Data
- B – Process Operating Data
- C – Gas Certifications
- D – Sample Calculations
- E – Correspondence



## 1. INTRODUCTION

This report presents the results of the source emissions testing conducted by Environmental Quality Management, Inc. (EQM) for TC Energy's ANR Pipeline (ANR) at Lincoln compressor station, near Lake George, Michigan, which is located in Clare County. The primary purpose of this testing program was to conduct emissions testing to determine compliance with Permit # ROP-N5586-2019 for the Emergency Generator APU at ANR Pipeline's gas compressor facility.

EQM's responsibility was to conduct the compliance testing for the O<sub>2</sub>, CO, VOC, and NO<sub>x</sub> emissions rates and perform data reduction for conformance evaluation. ANR Pipeline'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 TC Energy's process operations, and Compliance testing. The Compliance testing conducted on the Caterpillar 3412C Generator was performed on January 24, 2023, from 10:45 A.M. to 1:55 P.M.

The following requirements were specific for the testing program:

1. Equipment calibrations performed, and calibration data provided.
2. Three (3) sixty (60) -minute, minimum, O<sub>2</sub>, CO, VOC and NO<sub>x</sub> test runs performed at Emergency Generator labeled Unit APU at maximum achievable load and speed according to pipeline conditions pursuant to EPA, Title 40, Code of Federal Regulations, Part 60, Subpart JJJJ. For determination of VOC concentrations, samples were analyzed as prescribed in Reference Method 18 and Method 25A per 40 CFR 60, Subpart JJJJ to reduce methane levels.
3. Process manufacturing operations maintained at 100 +/- 10 percent peak load condition, or at maximum achievable load according with ambient conditions, 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, VOC and NO<sub>x</sub> emissions determinations.
5. Stratification was found to be less than 5% in the turbine exhausts.
6. Diluent corrected stratification test was performed in accordance with Subpart JJJJ.



The testing program was approved by and/or coordinated with Pedro Amieva, TC Energy's ANR Pipeline Company. The emission testing was performed by Karl Mast, Project Manager, Zach Hill, Field Activities Lead, EQM, and Eli Mergle, Test Technician, EQM. Michigan CAT was contracted to supply the load bank for the testing. The emission testing was observed by Nathanael Gentle, MEGLE.



## 2. TEST RESULTS SUMMARY

The compliance testing was performed on the Generator APU2 in accordance with the requirements of the Title 40, Code of Federal Regulations, Part 60 (40 CFR 60, Appendix A [Subpart JJJ]). A summary of the test results is given below:

Measured Unit	Run 1	Run 2	Run 3	Average	Permit Limit	Pass/Fail
NOx ppmvd @15% O <sub>2</sub>	41.45	41.47	40.83	41.25	160	Pass
CO ppmvd @ 15% O <sub>2</sub>	3.91	3.14	2.47	3.17	540	Pass
VOC ppmvd @ 15% O <sub>2</sub>	39.86	39.87	39.21	39.65	86	Pass

Based on the information provided above, the Generator 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 Tables 2-3.

Additional testing information may be found in Appendix A.



**Table 2. Operating & Ambient Conditions, Concentrations, & Emissions  
Unit APU**

Summary of Stack Gas Parameters and Test Results					
Generator-APU					
TC Energy Lincoln Compressor Station					
US EPA Test Method 3A, 7, 10, 18, & 25A					
Page 1 of 1					
	<b>RUN NUMBER</b>	<b>O-1</b>	<b>O-2</b>	<b>O-3</b>	<b>Average</b>
	<b>RUN DATE</b>	1/24/2023	1/24/2023	1/24/2023	
	<b>RUN START</b>	10:45	11:50	12:56	
<b>MEASURED DATA</b>					
$P_{bar}$	Barometric Pressure, inches Hg	28.904	28.891	28.874	28.89
$B_{ws}$	Moisture, % by volume	16.66	16.74	16.65	16.7
	<b>Kilowatts</b>	<b>453.0</b>	<b>453.0</b>	<b>453.0</b>	<b>453.0</b>
	<b>Oxygen</b>				
$O_2$	Concentration PPM Dry	8.42	8.39	8.39	8.40
	<b>Nitrogen Oxides</b>				
$NO_x$	Concentration PPM Dry	87.67	87.92	86.58	87.39
$NO_x$	Concentration PPM Dry @ 15% $O_2$	41.45	41.47	40.83	41.25
	<b>Carbon Monoxide</b>				
CO	Concentration PPM Dry	8.28	6.65	5.23	6.72
CO	Concentration PPM Dry @ 15% $O_2$	3.91	3.14	2.47	3.17
	<b>Total Hydrocarbons</b>				
THC	Concentration PPM Wet C1	1357.15	1325	1253.43	1311.86
THC	Concentration PPM Dry C1	1583.25	1546.81	1462.13	1530.73
$CH_4$	Concentration PPM Bag Sample	1330.3	1293.2	1212.7	1278.73
VOC	Concentration PPM Dry C1	252.95	253.61	249.43	251.99
VOC	Concentration PPM Dry C3	84.32	84.54	83.14	84.00
VOC	Concentration PPM Dry @ 15% $O_2$	39.86	39.87	39.21	39.65

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### 3. PROCESS DESCRIPTION

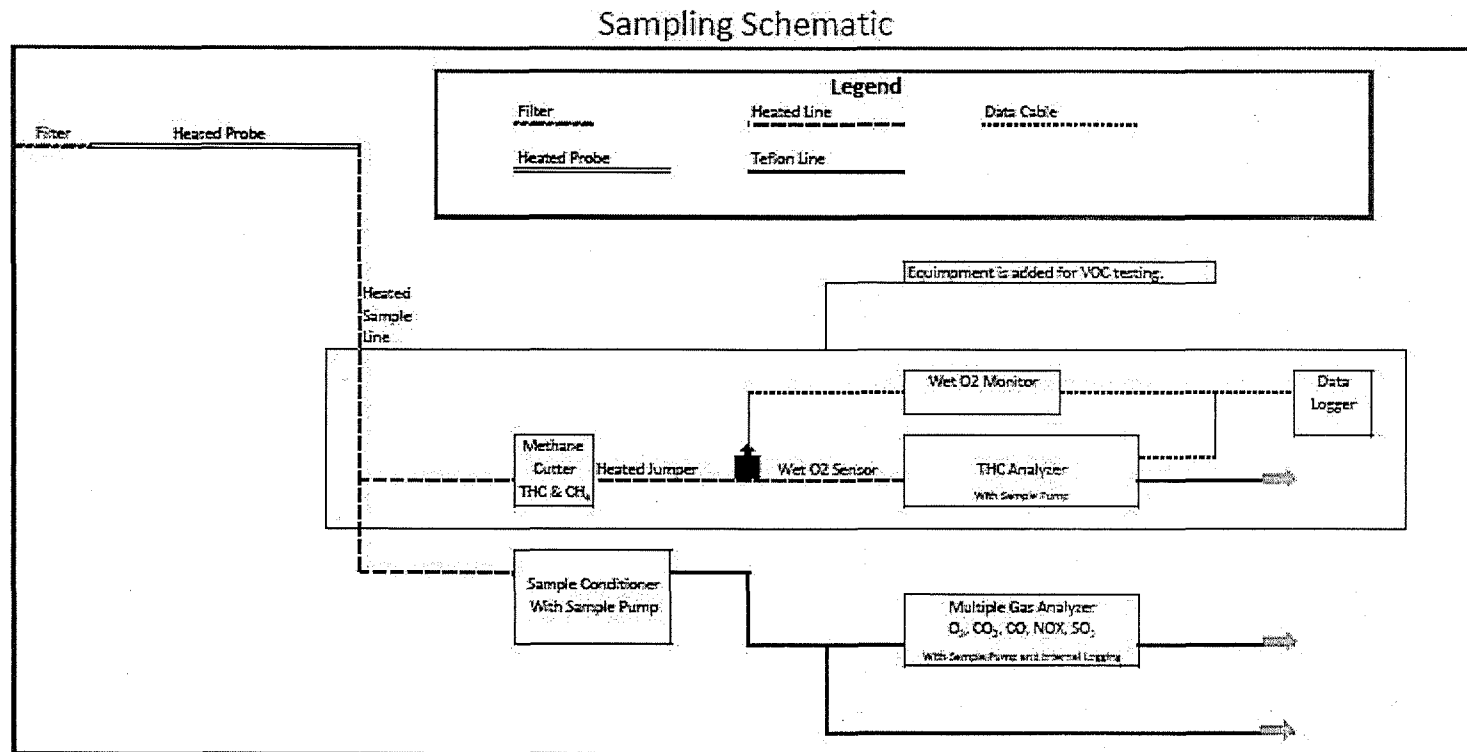
TC Energy’s ANR Lincoln Compressor Station is located at 3991 South Hickory, Lake George, MI, Clare County. The plant operates a Caterpillar 3412C natural gas fired internal combustion reciprocating engine utilized for supporting energy needs for the station. It is rated at 755 HP and 500 KW.

The following tables provide a summary of the production rates for the Emergency Generator during the test:

Unit/Measurement	Run 1	Run 2	Run 3	Average	Rated	% Load
<sup>1</sup> APU-HP	607.48	607.48	607.48	607.48	755 HP	80.46
APU-KW	453.0	453.0	453.0	453.0	500 KW	90.60

<sup>1</sup>Horsepower was calculated based on Kilowatt output, which was within the 90-100% operating range. More information may be found in Appendix A.

**Figure 1. Sampling Schematic**



Additional Information pertaining to the Fuel Flows may be found in Appendix B.



#### 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 4 – Determination of Moistures From Stationary Sources
- 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)
- U.S. EPA Method 18 – Determination of VOC Emissions From Stationary Sources (Instrumental Analyzer Procedure)
- U.S. EPA Method 25A – Determination of VOC Emissions From Stationary Sources (Instrumental Analyzer Procedure)

USEPA Methods 3A, 4, 7E, 10, 18 and 25A 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. Moistures were determined by Method 4 (hot and wet oxygen monitor).

At the start of the day, each monitor was checked for calibration error by introducing zero, mid-range 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 are as follows:

Calibration Correction

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

**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<sub>MA</sub>: Actual concentration of span gas (ppmvd)

EPA F-Factor

$$F_d = \frac{[(3.64 \cdot H_{Wt\%} \cdot 100) + (1.53 \cdot C_{Wt\%} \cdot 100)]}{GCV} \cdot 10^6$$

$$+ \frac{[(0.14 \cdot N_{2Wt\%} \cdot 100) - (0.46 \cdot O_{2Wt\%} \cdot 100)]}{GCV} \cdot 10^6$$

$\rho_{FuelGas}$

**Where:**

- F<sub>d</sub>: Fuel specific F-factor, dscf/MMBtu
- H<sub>Wt%</sub>: Hydrogen weight percent
- C<sub>Wt%</sub>: Carbon weight percent
- N<sub>2Wt%</sub>: Nitrogen weight percent
- O<sub>2Wt%</sub>: Oxygen weight percent
- GCV: Heating value of the fuel, BTU/dscf



$\rho_{Fuel Gas}$ : Density of the fuel gas, lb/scf

### Mass Emissions g/bhp-hr

$$Em = Cd \times Fd \times \frac{20.9}{(20.9 - \%O_2)} \times Qh \times \frac{GCV}{10^6} \times \frac{4536}{BHP}$$

#### Where:

$E_m$ : Pollutant concentration, NO<sub>x</sub>(g/bhp-hr)  
 $C_d$ : Pollutant concentration, NO<sub>x</sub> lb/scf  
 $\%O_2$ : Oxygen concentration in percent, measured on a dry basis  
 $F_d$ : Fuel specific F-factor, dscf/MMBtu  
 $Q_h$ : Fuel rate, scf/hr  
 $GCV$ : Heating value fuel, Btu/scf

To convert from ppmvd NO<sub>x</sub> to lb/scf NO<sub>x</sub>, multiply the ppmvd value by  $1.194 \times 10^{-7}$

To convert from ppmvd CO to lb/scf CO, multiply the ppmvd value by  $7.268 \times 10^{-8}$

### Mass Emission Calculations lb/hr

$$NO_{x \frac{lb}{hr}} = C_d \times F_d \times \frac{20.9}{20.9 - \%O_2} \times Q_h \times \frac{GCV}{10^6}$$

#### Where:

$C_d$ : Pollutant concentration, lb/scf  
 $F_d$ : Fuel specific F-factor, dscf/MMBtu  
 $Q_h$ : Fuel flow, scf/hr  
 $\%O_2$ : Oxygen concentration in percent, measured on a dry basis



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

NO<sub>x</sub> Corrected to 15% O<sub>2</sub>

$$Em = NO \times \left( \frac{5.9}{20.9 - \% O_2} \right)$$

**Where:**

Em: 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

NO Interference Response

$$INO = \left[ \left( \frac{R_{NO-NO_2}}{C_{NO_2G}} \times \frac{C_{NO_2S}}{C_{NO_xS}} \right) \right] \times 100$$

**Where:**

INO: NO interference response (%)

R<sub>NO-NO<sub>2</sub></sub>: NO response to NO<sub>2</sub> span gas (ppm NO)

C<sub>NO<sub>2</sub>G</sub>: Concentration of NO<sub>2</sub> span gas (ppm NO<sub>2</sub>)

C<sub>NO<sub>2</sub>S</sub>: Concentration of NO<sub>2</sub> in stack gas (ppm NO<sub>2</sub>)

C<sub>NO<sub>x</sub>S</sub>: Concentration of NO<sub>x</sub> in stack gas (ppm NO<sub>x</sub>)

VOC ppm

$$VOC_{ppmvd} = \frac{THC_{ppmv} - \frac{1}{3}CH_4_{ppmvd} - \frac{2}{3}C_2H_6_{ppmvd}}{1 - \left( \frac{\% H_2O}{100} \right)}$$



VOC mass emissions calculations g/bhp-hr

$$VOC \frac{g}{bhp-hr} = C_d \times F_d \times \frac{20.9}{20.9 - \%O_2} \times Q_h \times \frac{GCV}{10^6} \times \frac{453.6}{BHP}$$

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

VOC mass emissions calculations lb/hr

$$VOC \frac{g}{bhp-hr} = C_d \times F_d \times \frac{20.9}{20.9 - \%O_2} \times Q_h \times \frac{GCV}{10^6}$$

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

To convert ppm to lb/scf	Multiply by
NOx	1.194x10 <sup>-7</sup>
VOC	1.1444x10 <sup>-7</sup>

GVC: Heating value of the fuel, Btu/scf



## 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 Generator APU at TC Energy's ANR Pipeline Company's Lincoln Compressor Station located in Lake George, MI. The testing was conducted on January 24, 2023.

During the course of the testing, the Generator APU conformed to the requirements of Code of Federal Regulations, Title 40, Part 60, Appendix A.

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

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