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COMPLIANCE TEST REPORT

for

CARBON MONOXIDE (CO) EMISSIONS TESTING

WHITE-SUPERIOR COMPRESSOR ENGINE

ALPENA COMPRESSOR STATION Harrison, Michigan

May 11, 2017

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







EXECUTIVE SUMMARY

DTE Energy's Environmental Management and Resources (EMR) Field Services Group performed emissions testing at Alpena Compressor Station, located in Harrison, Michigan. The fieldwork, performed on May 11, 2017 was conducted to satisfy requirements of the Michigan Renewable Operating Permit No. MI-ROP-N5935-2014b and 40 CFR Part 63 Subpart ZZZZ. Emissions tests were performed on the White-Superior Compressor Engine for carbon monoxide (CO).

The results of the emissions testing are summarized below:

Emissions Testing Summary – Emergency Generator & Compressor Engine Alpena Compressor Station Harrison, Ml

May 11, 2017	Carbon Monoxide ⁽¹⁾ (ppm _{illy})		
White-Superior Compressor Engine	3.5		
Subpart ZZZZ Permit Limit	<47		

⁽¹⁾ ppm, corrected to 15% O_{2,drv}

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1.0 INTRODUCTION

DTE Energy's Environmental Management and Resources (EM&R) Field Services Group performed emissions testing at Alpena Compressor Station, located in Harrison, Michigan. The fieldwork, performed on May 11, 2017 was conducted to satisfy requirements of the Michigan Air Permit No. 10226R02 and 40 CFR Part 63 Subpart ZZZZ. Emissions tests were performed on the Compressor Engine for carbon monoxide (CO).

Testing was performed pursuant to Title 40, *Code of Federal Regulations*, Part 60, Appendix A (40 CFR §60 App. A), Methods 1-3A, and 10.

The fieldwork was performed in accordance with EPA Reference Methods and EMR's Intent to Test¹, which was approved by the Michigan Department of Environmental Quality (MDEQ)². The following DTE personnel participated in the testing program: Mr. Thomas Snyder, Environmental Specialist and Mr. Fred Meinecke, Sr. Environmental Technician. Mr. Snyder was the project leader.

Ms. Karla Shawhan-Bonnee, Manager, DTE Gas, provided on-site coordination and operation of the units. Mr. Rob Dickman, MDEQ, reviewed the Test Plan and Ms. Sharon LeBlanc, MDEQ, observed the testing.

2.0 SOURCE DESCRIPTION

The Alpena Compressor Station, located at 8512 East Arnold Lake Road, Harrison, MI is a natural gas compressor station. The facility operates one White-Superior, 4-cycle, lean burn, natural gas-fired 2,000 Horse Power reciprocating engine. The engine generates line pressure assisting in the transmission of natural gas throughout the pipeline transmission system in Michigan.

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

¹ MDEQ, Test Plan, Submitted April 20, 2017. (Attached-Appendix A)

² MDEQ, Acceptance Letter, April 27, 2017. (Attached-Appendix A)





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

3.0 SAMPLING AND ANALYTICAL PROCEDURES

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

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

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

3,1.1 Sampling Method

Oxygen (O₂) emissions were evaluated using USEPA Method 3A, "Gas Analysis for Carbon Dioxide, Oxygen, Excess Air, and Dry Molecular Weight (Instrumental Analyzer Method)". The O₂ analyzer utilizes a paramagnetic sensor.

3.1.2 O₂ and CO Sampling Train

The EPA Methods 3A and 10 sampling system (Figure 1) consisted of the following components:

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

3.1.3 Sampling Duration & Frequency

The emissions testing of the engine consisted of triplicate 1.5-minute samples at the inlet and exhaust of the catalyst. Testing was conducted at three points across the

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diameter of the duct during each run. Sampling was performed simultaneously for O_2 and CO. Data was recorded at 10-second intervals.

3.1.4 Quality Control and Assurance (O₂ and CO)

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

Calibration gas certification sheets are located in Appendix C.

3.1.5 Data Reduction

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

Emissions calculations are based on calculations located in USEPA Methods 7E, 10, and 19 and can be found in Appendix D. The CO emissions data collected during the testing was calculated as parts per million, corrected to 15% oxygen (ppm @ $15\% O_2$).

4.0 **OPERATING PARAMETERS**

The test program included the collection of compressor data collected included engine speed (RPM) and torque (Hp), fuel flow, inlet & exhaust manifold air pressure (psi) and temperature (F), and differential pressure across the catalyst (in. H_2O).

Operational data is located in Appendix E.

5.0 DISCUSSION OF RESULTS

The Results Table presents the emission testing results from Compressor Engine while operating at greater than 90% of full load conditions. The CO emissions are presented in parts per million, corrected to 15% oxygen (ppm @ 15% O₂). Additional test data presented for each test includes the collected operating data.

The results from the testing demonstrate that the Compressor Engine is in compliance with Michigan Renewable Operating Permit No. MI-ROP-N5935-2014b and 40 CFR Part 63 Subpart ZZZZ.



6.0 CERTIFICATION STATEMENT

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

Thomas Snyder, OST

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White-Superior Compressor Engine DTE Energy Gas, Alpena Compressor Station Harrison, MI

Parameter	Run 1	Run 2	Run 3	Average
Sampling Date	05/11/17	05/11/17	05/11/17	
Sampling Start Time	12:00-12:15	12:26-12:41	12:52-13:07	
Load (%)	92.5	93.5	96.5	
Speed (RPM)	895.0	887.5	897.5	
Brake-HP	1835.0	1840.0	1923.0	
Average Outlet O_2 Concentration (%, dry)	8.4	8.4	8.5	8.4
Average Outlet O_2 Concentration (%, dry, corrected) ¹	8.5	8.5	8.5	8.5
Average Outlet CO Concentration (ppmv, dry)	7.4	7.5	7.3	7.4
Average Outlet CO Concentration (ppmv, dry, corrected) ¹	7.3	. 7.4	7.3	7.4
Average Outlet CO Concentration (ppmv, dry, @15% O_2) ¹	3.5	3.5	3.5	3.5

¹corrected for analyzer drift as per USEPA Method 7E

O₂ : oxygen

CO : carbon monoxide



