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**AIR EMISSION TEST REPORT**

Title                   TEST REPORT FOR THE VERIFICATION OF AIR POLLUTANT  
EMISSIONS FROM A LANDFILL GAS-FUELED  
RECIPROCATING ENGINE

Report Date   April 21, 2016

Test Dates     April 20, 2016

<b>Facility Information</b>	
Name	Pine Tree Acres, Inc. (Landfill)
Street Address	36600 29-Mile Rd.
City, County	Lenox Township, Macomb
SRN	N5984

<b>Permit Information</b>	
Permit to Install No.:	PTI 160-14
Operating Permit No.	MI-ROP-N5984-2013

<b>Source Information</b>	
Emission Unit; Serial No.:	EUICENGINE5; GZJ00462

<b>Testing Contractor</b>	
Company	Derenzo Environmental Services
Mailing Address	39395 Schoolcraft Road Livonia, MI 48150
Phone	(734) 464-3880
Project No.	1512002



MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY  
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RENEWABLE OPERATING PERMIT  
REPORT CERTIFICATION

AIR QUALITY DIV.

Authorized by 1994 P.A. 451, as amended. Failure to provide this information may result in civil and/or criminal penalties.

Reports submitted pursuant to R 336.1213 (Rule 213), subrules (3)(c) and/or (4)(c), of Michigan's Renewable Operating Permit (ROP) program must be certified by a responsible official. Additional information regarding the reports and documentation listed below must be kept on file for at least 5 years, as specified in Rule 213(3)(b)(ii), and be made available to the Department of Environmental Quality, Air Quality Division upon request.

Source Name Waste Management of Michigan, Inc. County Macomb

Source Address Pine Tree Acres Landfill, 36600 29 Mile Rd City Lenox Twp

AQD Source ID (SRN) N5984 ROP No. N5984-2013 ROP Section No. \_\_\_\_\_

Please check the appropriate box(es):

**Annual Compliance Certification (Pursuant to Rule 213(4)(c))**

Reporting period (provide inclusive dates): From \_\_\_\_\_ To \_\_\_\_\_

1. During the entire reporting period, this source was in compliance with ALL terms and conditions contained in the ROP, each term and condition of which is identified and included by this reference. The method(s) used to determine compliance is/are the method(s) specified in the ROP.

2. During the entire reporting period this source was in compliance with all terms and conditions contained in the ROP, each term and condition of which is identified and included by this reference, EXCEPT for the deviations identified on the enclosed deviation report(s). The method used to determine compliance for each term and condition is the method specified in the ROP, unless otherwise indicated and described on the enclosed deviation report(s).

**Semi-Annual (or More Frequent) Report Certification (Pursuant to Rule 213(3)(c))**

Reporting period (provide inclusive dates): From \_\_\_\_\_ To \_\_\_\_\_

1. During the entire reporting period, ALL monitoring and associated recordkeeping requirements in the ROP were met and no deviations from these requirements or any other terms or conditions occurred.

2. During the entire reporting period, all monitoring and associated recordkeeping requirements in the ROP were met and no deviations from these requirements or any other terms or conditions occurred, EXCEPT for the deviations identified on the enclosed deviation report(s).

**Other Report Certification**

Reporting period (provide inclusive dates): From \_\_\_\_\_ To \_\_\_\_\_

Additional monitoring reports or other applicable documents required by the ROP are attached as described:

Test Report for retest of landfill gas fired IC Engine No. 5 (EUCENGINE5).

The testing was conducted in accordance with the Test Plan dated January 8, 2016 and

PTI 160-14. The facility was operated in compliance with the permit conditions

or at the maximum routine operating conditions for the facility.

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in this report and the supporting enclosures are true, accurate and complete

<u>Charles H. Cassie</u>	<u>Senior District Manager</u>	<u>(248) 391-0990</u>
Name of Responsible Official (print or type)	Title	Phone Number
		<u>4-22-16</u>
Signature of Responsible Official		Date

AIR EMISSION TEST REPORT  
FOR THE  
VERIFICATION OF AIR POLLUTANT EMISSIONS FROM  
A LANDFILL GAS-FUELED  
RECIPROCATING ENGINE

PINE TREE ACRES LANDFILL

**1.0 INTRODUCTION**

Pine Tree Acres, Inc. (PTA) operates eight (8) Caterpillar (CAT®) Model No. G3520C landfill gas (LFG) fueled reciprocating internal combustion engine (RICE) generator sets, two (2) enclosed flares and two open flares at the Pine Tree Acres Landfill (PTAL, Facility SRN: N5984) in Lenox Township, Macomb County, Michigan. The facility has been issued Renewable Operating Permit (ROP) No. MI-ROP-N5984-2013 and Permit to Install (PTI) No. 160-14 by the Michigan Department of Environmental Quality (MDEQ).

Air emission testing was performed to demonstrate compliance with conditions of ROP No. MI-ROP-N5984-2013, PTI No. 160-14, and 40 CFR Part 60 Subpart JJJJ.

All eight (8) of the RICE generator sets, identified as emission units EUCENGINE1 through EUCENGINE8 and flexible group FGICENGINES, were tested for carbon monoxide (CO), nitrogen oxide (NO<sub>x</sub>), and volatile organic compound (VOC) emissions on February 8 – 18, 2016. All eight (8) engines demonstrated compliance with the emission limits specified in 40 CFR Part 60 Subpart JJJJ during the February test event, however, the measured CO emission rate for Engine No. 5 (EUCENGINE5) was 16.8 lb/hr (the permitted CO emission limit is 16.3 lb/hr). The permit exceedance was discovered on April 14, 2016 during Waste Management's review of the draft test report. An incorrect exhaust diameter was initially used in the emission calculations completed during testing, and in the draft test report, that resulted in a lower calculated CO emission rate. After correcting the calculation, Waste Management received confirmation that Engine No. 5 had failed the emission test for CO (permitted emission limit). Upon discovery of the exceedance the MDEQ was notified and Waste Management shut Engine No. 5 down to perform additional maintenance. Corrective actions were taken by the facility and a retest was scheduled. This report presents the results of the Engine No. 5 retest.

The compliance testing was performed by Derenzo Environmental Services (DES), a Michigan-based environmental consulting and testing company. DES representatives Daniel Wilson, and Andy Rusnak performed the field sampling and measurements on April 20, 2016

The exhaust gas sampling and analysis was performed using procedures specified in the Test Plan, dated January 8, 2016, that was reviewed and approved by the MDEQ in the January 26, 2016 test plan approval letter. MDEQ representatives Ms. Rebecca Loftus and Mr. David Patterson observed portions of the testing project.

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Questions regarding this emission test report should be directed to:

Andy Rusnak, QSTI  
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Derenzo Environmental Services  
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Holt, MI 48842  
Ph: (517) 268-0043

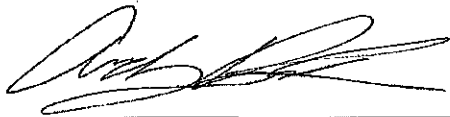
Mr. Steve Walters  
Environmental Engineer  
Waste Management of Michigan, Inc.  
36600 29-Mile Rd.  
Lenox Twp., MI 48048  
Ph: (586) 634-8085

**Report Certification**

This test report was prepared by Derenzo Environmental Services based on field sampling data collected by Derenzo Environmental Services. Facility process data were collected and provided Waste Management / Pine Tree Acres, Inc employees or representatives. This test report has been reviewed by Waste Management / Pine Tree Acres, Inc. representatives and approved for submittal to the MDEQ.

I certify that the testing was conducted in accordance with the specified test methods and submitted test plan unless otherwise specified in this report. I believe the information provided in this report and its attachments are true, accurate, and complete.

Report Prepared By:



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Andy Rusnak, QSTI  
Technical Manager  
Derenzo Environmental Services

A Renewable Operating Permit Report Certification form signed by the source responsible official accompanies this report.

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

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

One (1) LFG-fueled RICE (EUCENGINE5) was tested for CO, NO<sub>x</sub> and VOC emissions pursuant to the conditions of MI-ROP-N5984-2013, PTI No. 160-14, and 40 CFR Part 60 Subpart JJJJ. The test event was a retest of the February 8, 2016 Engine No. 5 testing (during which the CO emission rate exceeded the permitted CO emission limit).

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

The engine testing was performed while the RICE-generator set was operated at maximum operating conditions (within 10% of the rated electricity output of 1,600 kW). PTAL representatives monitored and recorded the kW output at 15-minute intervals for each test period. The RICE generator kW output ranged between 1,620 and 1,646 kW during the test periods.

Fuel flowrate (cubic feet per minute) and fuel methane content (%) were also recorded during the RICE test periods by PTAL representatives at 15-minute intervals. The RICE fuel consumption rate ranged between 552 and 565 scfm and fuel methane content ranged between 50.1 and 50.2% during the test periods. Other operating data (air-to-fuel ratio, fuel header inlet pressure, and engine operating hours) were recorded as required by the test plan approval letter.

Engine output (bhp) cannot be measured directly and was calculated based on the recorded electricity output, the calculated CAT® Model G3520C generator efficiency (96%), and the unit conversion factor for kW to horsepower (0.7457 kW/hp).

$$\text{Engine output (bhp)} = \text{Electricity output (kW)} / (0.96) / (0.7457 \text{ kW/hp})$$

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

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

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

The gases exhausted from the treated LFG fueled RICE was sampled for three (3) one-hour test periods during the compliance testing performed April 20, 2016.

Table 2.2 presents the average measured CO, NO<sub>x</sub>, and VOC emission rates for Engine No. 5 (average of the three test periods) and applicable emission limits.

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

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**2.4 Measured Emission Rates Compared to Permitted Emission Limits**

Results of the RICE performance test demonstrates compliance with emission standards specified in 40 CFR Part 60 Subpart JJJJ (SI RICE NSPS).

The measured RICE CO, NO<sub>x</sub> and VOC emissions demonstrate compliance with the applicable limits specified in MI-ROP-N5984-2013 and PTI No. 160-14.

Table 2.1 Average engine operating conditions during the RICE test periods

Emission Unit	Gen. Output (kW)	Engine Output (bHp)	Fuel Use (scfm)	LFG CH <sub>4</sub> Content (%)	LFG Btu Content (Btu/scf)	Exhaust Temp. (°F)	Air to Fuel Ratio	Inlet Press. (psi)
EUICENGINE5	1,636	2,285	560	50.1	456	919	8.2	4.07

Table 2.2 Average measured CO, NO<sub>x</sub>, and VOC emission rates for the RICE generator set (three-test average)

Emission Unit	CO Emission Rates		NO <sub>x</sub> Emission Rates		VOC Emission Rates	
	(lb/hr)	(g/bhp-hr)	(lb/hr)	(g/bhp-hr)	(lb/hr)	(g/bhp-hr)
EUICENGINE5	10.7	2.13	2.23	0.44	0.43	0.08
<i>NSPS Standard</i>	--	5.0	--	2.0	--	1.0
<i>Permit Limit</i>	16.3	3.3	3.0	0.6	1.0	1.0

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

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

LFG recovered from the PTAL is treated and used as fuel in the renewable energy facility or combusted in flaring systems. The renewable energy facility consists of eight (8) Caterpillar (CAT®) Model No. G3520C RICE-generator sets identified as emission units EUCENGINE1 through EUCENGINE8.

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

The CAT® Model No. G3520C RICE have a rated output of 2,233 brake-horsepower (bhp) and the connected generators have a rated electricity output of 1,600 kilowatts (kW). The engines are designed to fire low-pressure, lean fuel mixtures (e.g., treated LFG) and are equipped with air-to-fuel ratio controllers that monitor engine performance parameters and automatically adjust the air-to-fuel ratio to maintain efficient fuel combustion. The fuel consumption rate is regulated automatically to maintain the heat input rate required to support engine operations and is dependent on the fuel heat value (methane content) of the treated LFG.

The RICE generator sets are not equipped with add-on emission control devices. Air pollutant emissions are minimized through the proper operation of the gas treatment system and efficient fuel combustion in the engines.

#### **3.3 Sampling Location**

The RICE exhaust gas is directed through a muffler and is released to the atmosphere through a dedicated vertical exhaust stack. The exhaust sampling ports for the CAT® Model G3520C engine (EUCENGINE5) are located in a horizontal exhaust duct, located before the engine silencer, with an inner diameter of 15.0 inches. After the engine silencer the exhaust stack diameter is reduced to 14.0 inches as specified in the permit. The duct is equipped with two (2) sample ports, opposed 90°, that provide a sampling location 38.0 inches (2.5 duct diameters) upstream and 45.0 inches (3.0 duct diameters) downstream from any flow disturbance and satisfies the USEPA Method 1 criteria for a representative sample location.

Individual traverse points were determined in accordance with USEPA Method 1.

Appendix 1 provides a diagram of the emission test sampling location.

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

A test protocol for the air emission testing was reviewed and approved by the MDEQ. 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 zirconia ion/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 a chemiluminescence instrumental analyzer.
USEPA Method 10	Exhaust gas CO concentration was measured using an NDIR instrumental analyzer.
USEPA Method 25A / ALT-096	Exhaust gas VOC (as NMHC) concentration was determined using a flame ionization analyzer equipped with a GC column.

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

The exhaust stack gas velocity and volumetric flow rate was determined using USEPA Method 2 prior to and after each test. 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 periodically leak-checked to verify the integrity of the measurement system.

The absence of significant cyclonic flow for the exhaust configuration 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 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 1440D single beam single wavelength (SBSW) infrared gas analyzer. The O<sub>2</sub> content of the exhaust was monitored using a Servomex 1440D gas analyzer that uses a paramagnetic sensor.

During each sampling period, a continuous sample of the 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 exhaust gas stream 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 NOx and CO Concentration Measurements (USEPA Methods 7E and 10)**

NOx and CO pollutant concentrations in the exhaust gas stream was determined using a Thermo Environmental Instruments, Inc. (TEI) Model 42c High Level chemiluminescence NOx analyzer and a TEI Model 48i infrared CO analyzer.

Throughout each test period, a continuous sample of the engine exhaust gas was extracted from the stack using the 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 NOx calculation sheets. Raw instrument response data are provided in Appendix 5.

#### **4.6 Measurement of Volatile Organic Compounds (USEPA Method 25A/ALT-096)**

The RICE 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 Alternate Test Method 096 approving the use of the TEI 55i-series analyzer as an effective instrument for measuring NMOC from gas-fueled reciprocating internal combustion engines (RICE) in that it uses USEPA Method 25A and 18.

Samples of the exhaust gas were delivered directly to the instrumental analyzer using the Teflon® heated sample line to prevent condensation. The sample to the NHMC analyzer was not conditioned to remove moisture. Therefore, VOC measurements correspond to standard conditions with no moisture correction (wet basis).

Prior to, and at the conclusion of each test, the instrument was calibrated using mid-range calibration (propane) and zero gas to determine analyzer calibration error and system bias (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 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 within 90% of the expected value.

The NO<sub>2</sub> – NO conversion efficiency test satisfied the USEPA Method 7E criteria. The measured NO<sub>2</sub> concentration was within 93% of the expected value.

### **5.2 Sampling System Response Time Determination**

The response time of the sampling system was determined prior to the compliance test program by introducing upscale gas and zero gas, in series, into the sampling system using a tee connection at the base of the sample probe. The elapsed time for the analyzer to display a reading of 95% of the expected concentration was determined using a stopwatch.

The TEI Model 48i analyzer exhibited the longest system response time at 87 seconds. Results of the response time determinations were recorded on field data sheets. For each test period, test data were collected once the sample probe was in position for at least twice the maximum system response time.

### **5.3 Gas Divider Certification (USEPA Method 205)**

A STEC Model SGD-710C 10-step gas divider was used to obtain appropriate calibration span gases. The ten-step STEC gas divider was NIST certified (within the last 12 months) with a primary flow standard in accordance with Method 205. When cut with an appropriate zero gas, the ten-step STEC gas divider delivered calibration gas values ranging from 0% to 100% (in 10% step increments) of the USEPA Protocol 1 calibration gas that was introduced into the system. The field evaluation procedures presented in Section 3.2 of Method 205 were followed prior to use of gas divider. The field evaluation yielded no errors greater than 2% of the triplicate measured average and no errors greater than 2% from the expected values.

### **5.4 Instrumental Analyzer Interference Check**

The instrumental analyzers used to measure NO<sub>x</sub>, CO, O<sub>2</sub> and CO<sub>2</sub> have had an interference response test preformed prior to their use in the field (July 26, 2006, June 12, 2014 and April 19, 2016), 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 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 each exhaust stack indicated that the measured CO, 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 exhaust gas was considered to be unstratified and the compliance test sampling was performed at a single sampling location within each exhaust stack.

### **5.7 Meter Box Calibrations**

The Nutech Model 2010 sampling console, which was used for the 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 digital pyrometer in the metering console was 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, stratification checks, Pitot tube and probe assembly calibration records).

## **6.0 RESULTS**

### **6.1 RICE NO<sub>x</sub>, CO and VOC Emissions**

Engine No. 5 was tested for NO<sub>x</sub>, CO and VOC emission rates. The measured air pollutant concentrations and emission rates for each one-hour test period are presented in Tables 6.1.

The measured emission rates are less than 40 CFR Part 60 Subpart JJJJ (SI RICE NSPS) emission standards; 2.0 g/bhp-hr NO<sub>x</sub>, 5.0 g/bhp-hr CO and 1.0 g/bhp-hr VOC.

The measured emission rates are less than the allowable rates specified in, MI-ROP-N5984-2013, and PTI No. 160-14:

- 3.0 lb/hr and 0.6 g/bhp-hr for NO<sub>x</sub>;
- 16.3 lb/hr and 3.3 g/bhp-hr for CO; and
- 1.0 lb/hr 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 the approved test protocols and there were no deviations from the approved test methods. The RICE generator sets were operated within 10% of maximum output.

**Derenzo Environmental Services**Waste Management Pine Tree Acres Landfill  
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Page 12Table 6.1 Measured exhaust gas conditions and NO<sub>x</sub>, CO, and VOC emission rates  
Engine No. 5 (EUCENGINE5, SN: GZJ00462)

Test No.	1	2	3	Three Test
Test date	4/20/16	4/20/16	4/20/16	Average
Test period (24-hr clock)	753 - 853	917 - 1017	1040 - 1140	
Fuel flowrate (scfm)	560	558	562	560
Generator output (kW)	1,634	1,639	1,634	1,636
Engine output (bhp)	2,283	2,289	2,283	2,285
LFG methane content (%)	50.1	50.2	50.2	50.1
LFG LHV heat content (Btu/scf)	455	456	456	456
Air / Fuel Ratio	8.2	8.2	8.2	8.2
Inlet Pressure (psi)	4.06	4.08	4.08	4.07
<u>Exhaust Gas Composition</u>				
CO <sub>2</sub> content (% vol)	11.5	11.5	11.5	11.5
O <sub>2</sub> content (% vol)	8.27	8.28	8.30	8.28
Moisture (% vol)	11.0	11.1	11.2	11.1
Exhaust gas temperature (°F)	919	919	918	919
Exhaust gas flowrate (dscfm)	4,473	4,451	4,409	4,444
Exhaust gas flowrate (scfm)	5,029	5,012	4,967	5,003
<u>Nitrogen Oxides</u>				
NO <sub>x</sub> conc. (ppmvd)	71.0	70.4	68.5	70.0
NO <sub>x</sub> emissions (g/bhp*hr)	0.45	0.44	0.43	0.44
Permitted emissions (g/bhp*hr)	-	-	-	0.6
NO <sub>x</sub> emissions (lb/hr)	2.28	2.25	2.17	2.23
Permitted emissions (lb/hr)	-	-	-	3.0
<u>Carbon Monoxide</u>				
CO conc. (ppmvd)	562	552	541	552
CO emissions (g/bhp*hr)	2.18	2.13	2.07	2.13
Permitted emissions (g/bhp*hr)	-	-	-	3.3
CO emissions (lb/hr)	11.0	10.7	10.4	10.7
Permitted emissions (lb/hr)	-	-	-	16.3
<u>Volatile Organic Compounds</u>				
VOC conc. (ppmv)	12.1	12.5	12.8	12.4
VOC emissions (g/bhp*hr)	0.08	0.09	0.09	0.08
Permitted emissions (g/bhp*hr)	-	-	-	1.0
VOC emissions (lb/hr)	0.42	0.43	0.44	0.43
Permitted emissions (lb/hr)	-	-	-	1.0