

RECEIVED

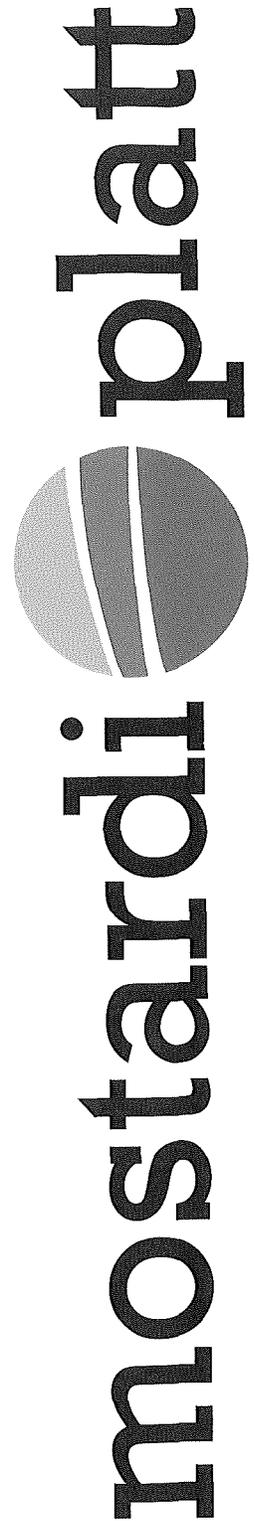
OCT 25 2022

AIR QUALITY DIVISION

# Relative Accuracy Test Audit Test Report

---

Lansing Board of Water and Light  
Erickson Station  
Unit 1 Stack  
Lansing, Michigan  
Project No. M223207B  
September 7 and 8, 2022



B4001-Test-20220907





**Relative Accuracy Test Audit  
Test Report**

**Lansing Board of Water and Light  
Erickson Station  
Unit 1 Stack  
Lansing, Michigan  
September 7 and 8, 2022**

**Report Submittal Date  
October 11, 2022**

© Copyright 2022  
All rights reserved in  
Mostardi Platt

**Project No. M223207B**

**RECEIVED**

**OCT 25 2022**

**AIR QUALITY DIVISION**



---

## TABLE OF CONTENTS

1.0 EXECUTIVE SUMMARY .....	1
2.0 TEST METHODOLOGY .....	3
Method 1 Sample and Velocity Traverse Determination .....	3
Method 2 Volumetric Flow Rate Determination .....	3
Method 3 Oxygen (O <sub>2</sub> )/Carbon Dioxide (CO <sub>2</sub> ) Determination .....	3
Method 3A Carbon Dioxide (CO <sub>2</sub> ) Determination .....	3
Moisture (H <sub>2</sub> O) Determination .....	4
Method 6C Sulfur Dioxide (SO <sub>2</sub> ) Determination .....	5
Method 7E Nitrogen Oxides (NO <sub>x</sub> ) Determination .....	6
3.0 TEST RESULT SUMMARIES .....	7
4.0 CERTIFICATION.....	12
APPENDICES	
Appendix A - Company AETB Certification .....	14
Appendix B - QI Certification(s) for Field Personnel.....	17
Appendix C - Test Section Diagrams .....	19
Appendix D - Sample Train Diagrams .....	22
Appendix E - Calculation Nomenclature and Formulas.....	27
Appendix F - Reference Method Test Data (Computerized Sheets).....	37
Appendix G - Continuous Emissions Monitoring System Data and Plant Operating Data .....	68
Appendix H - Field Data Sheets .....	84
Appendix I - Calibration and Response Time Data .....	110
Appendix J - Calibration Gas Cylinder Data.....	131
Appendix K - NO <sub>2</sub> to NO Converter Efficiency Test .....	140



## 1.0 EXECUTIVE SUMMARY

Mostardi Platt conducted a Continuous Emissions Monitoring System (CEMS) Relative Accuracy Test Audit (RATA) test program for Lansing Board of Water and Light at the Erickson Station in Lansing, Michigan, on the Unit 1 Stack on September 7 and 8, 2022. This report summarizes the results of the test program and test methods used in accordance with the Mostardi Platt test protocol M213102 dated July 25, 2022. Mostardi Platt is a self-certified air emissions testing body (AETB). A copy of Mostardi Platt's self-certification can be found in Appendix A.

The test location, test dates, and test parameters are summarized below.

TEST INFORMATION		
Test Location	Test Dates	Test Parameters
Unit 1 Stack	September 7 and 8, 2022	Carbon Dioxide (CO <sub>2</sub> ), Sulfur Dioxide (SO <sub>2</sub> ), Nitrogen Oxides (NO <sub>x</sub> ), and Volumetric Flow

The purpose of the test program was to demonstrate the relative accuracies of the Unit 1 Stack CO<sub>2</sub>, SO<sub>2</sub>, NO<sub>x</sub>, and volumetric flow analyzers during the specified operating conditions. The test results from this test program indicate that each CEMS component meets the United States Environmental Protection Agency (USEPA) annual performance specification for relative accuracy as published in 40 Code of Federal Regulations Part 75 (40CFR75).

RATA RESULTS						
Test Location	Date	Parameter	Units	Relative Accuracy Acceptance Criteria	Relative Accuracy (RA)	Bias Adjustment Factor (BAF)
Unit 1 Stack	9/8/2022	NO <sub>x</sub>	lb/mmBtu	≤ 7.5% of the mean reference value	3.11%	1.000
		SO <sub>2</sub>	ppmv	≤ 7.5% of the mean reference value	2.59%	1.000
		CO <sub>2</sub>	% wet	≤ 7.5% of the mean reference value	3.20%	N/A
	9/7/2022	Volumetric Flow –High (Normal) Load	scfh	≤ 7.5% of the mean reference value	2.58%	1.000
	9/8/2022	Volumetric Flow – Low Load	scfh	≤ 7.5% of the mean reference value	2.84%	1.000

The gas cylinders used to perform the RATA are summarized below.

GAS CYLINDER INFORMATION				
Parameter	Gas Vendor	Cylinder Serial Number	Cylinder Value	Expiration Date
NO <sub>x</sub>	Airgas	CC734120	91.25 ppm	3/31/2030
NO <sub>x</sub>	Airgas	EB0056532	179.3 ppm	7/27/2028
SO <sub>2</sub>	Airgas	CC366403	253.7 ppm	6/27/2030
SO <sub>2</sub>	Airgas	CC127903	480.3 ppm	4/18/2030
CO <sub>2</sub>	Airgas	ALM015018	10.36%	1/25/2030
CO <sub>2</sub>	Airgas	CC235318	19.39%	4/1/2029
CO <sub>2</sub>	Airgas	LL37299	9.896%	3/16/2030
CO <sub>2</sub>	Airgas	LL107691	18.67%	2/17/2030
O <sub>2</sub>	Airgas	LL37299	10.03%	3/16/2030
O <sub>2</sub>	Airgas	LL107691	19.49%	2/14/2030

No deviations, additions, or exclusions from the test protocol, test methods, the Mostardi Platt Quality Manual, or the ASTM D7036-12 occurred. The specific test conditions encountered did not interfere with the collection of the data.

The identifications of the individuals associated with the test program are summarized below.

TEST PERSONNEL INFORMATION		
Location	Address	Contact
Test Coordinator	Lansing Board of Water and Light 1201 S. Washington Ave. Lansing, Michigan 48910	Nathan Hude Environmental Regulatory Compliance – Air (517) 705-6170 (phone) Nathan.hude@lbwl.com
Test Facility	Lansing Board of Water and Light Erickson Station 3725 S. Canal Road Lansing, Michigan 48917	
Testing Company Supervisor	Mostardi Platt 888 Industrial Drive Elmhurst, Illinois 60126	Stuart Burton Project Manager 630-993-2100 (phone) sburton@mp-mail.com QI Group V (certified on 1/4/18)
Testing Company Personnel		Christopher Buglio Test Engineer
		Kenneth Beckham Test Engineer
		Tiernan Long Test Engineer
		Timothy Yanowsky Test Technician

Copies of the QI certifications for test personnel are included in Appendix B.

## 2.0 TEST METHODOLOGY

Emission testing was conducted following the United States Environmental Protection Agency (USEPA) methods specified in 40CFR75, 40 Code of Federal Regulations (40CFR60), Appendix A, and ASTM E337-02 in addition to the Mostardi Platt Quality Manual and the test protocol. Schematics of the test section diagrams and sampling trains used are included in Appendix C and D respectively. Calculation and nomenclature are included in Appendix E. Copies of analyzer print-outs for each test run are included in Appendix F. CEM data and process data as provided by Lansing Board of Water and Light are included in Appendix G.

The following methodologies were used during the test program:

### Method 1 Sample and Velocity Traverse Determination

Test measurement points were selected in accordance with USEPA Method 1, 40CFR60, Appendix A. The characteristics of the measurement location are summarized below.

TEST POINT INFORMATION AT UNIT 1 STACK							
Stack Diameter (Feet)	Stack Area (Square Feet)	No. of Ports	Port Length (Inches)	Upstream Diameters	Downstream Diameters	Test Parameter	Number of Sampling Points
17.0	226.98	4	78.0	7.94	11.76	Volumetric Flow	16

### Method 2 Volumetric Flow Rate Determination

Gas velocity was measured following USEPA Method 2, 40CFR60, Appendix A, for purposes of calculating stack gas volumetric flow rate. A 12-foot-long S-type pitot tube, 0-10-inch differential pressure gauge, and K-type thermocouple and temperature readout were used to determine gas velocity at each sample point. All of the equipment used was calibrated in accordance with the specifications of the Method. Copies of field data sheets are included in Appendix H. Calibration data is presented in Appendix I. This testing met the performance specifications as outlined in the Method.

### Method 3 Oxygen (O<sub>2</sub>)/Carbon Dioxide (CO<sub>2</sub>) Determination

Stack gas molecular weight was determined in accordance with USEPA Method 3, 40CFR60, Appendix A, during each volumetric flow rate determination. A Fyrite analyzer was used to determine stack gas O<sub>2</sub> and CO<sub>2</sub> content and, by difference, nitrogen content. Multiple gas extractions were performed during each test run to ensure a stable reading. Chemicals are changed frequently and inspected for reactivity prior to each use. This testing met the performance specifications as outlined in the Method.

### Method 3A Carbon Dioxide (CO<sub>2</sub>) Determination

Stack gas CO<sub>2</sub> concentrations were determined in accordance with USEPA Method 3A, 40CFR60, Appendix A. A Thermo Scientific Model 410i Optical Filter Carbon Dioxide Analyzer was used to determine carbon dioxide concentrations in the manner specified in the Method. The instrument has a nondispersive infrared-based detector and operated in the nominal range of 0% to 20% with the specific range determined by the high-level span calibration gas of 19.39%.

The Model 410i operates on the principle that CO<sub>2</sub> absorbs infrared radiation at a wavelength of 4.26 microns. The sample is drawn into the Model 410i through the sample bulkhead. The sample flows through the optical bench. Radiation from an infrared source is chopped and then passed through a rotating optical wheel alternating between sample and reference filters. The radiation then enters the optical bench where absorption by the sample gas occurs. The infrared radiation then exits the optical bench and falls on an infrared detector. The chopped detector signal is modulated by the alternation between the filters with an amplitude related to the concentration of CO<sub>2</sub> in the sample cell. Because infrared absorption is a non-linear measurement, it is necessary to transform the basic analyzer signal into a linear output. The Model 410i uses an internally stored calibration curve to accurately linearize the instrument output over any range up to a concentration of 10,000 ppm. The Model 410i outputs the CO<sub>2</sub> concentration to the front panel display, the analog outputs, and also makes the data available over the serial or ethernet connection.

Stack gas was delivered to the analyzer through an EPM in-situ dilution sampling system. Stack gas concentrations were diluted at a nominal 100:1 ratio utilizing purified dilution air. The entire system was calibrated in accordance with the Method, using USEPA Protocol gases introduced at the probe, before and after each test run.

A list of calibration gases used and the results of all calibration and other required quality assurance checks are found in Appendix I. Copies of the gas cylinder certifications are found in Appendix J. This testing met the performance specifications as outlined in the Method.

### Moisture (H<sub>2</sub>O) Determination

ASTM Method E337-02, reapproved 2002, was used to determine the moisture content of the gas stream using wet bulb/dry bulb measurements during each volumetric flow test run in order to calculate the gas volumetric air flow on a dry basis. The water vapor content was calculated as follows:

$$Bws = \left[ \frac{e' - AP(t - t')}{P} \right]$$

where:

e' = saturated vapor pressure of water, in. Hg, at the wet bulb temperature, t'

A =  $3.67 \times 10^{-4} [1 + 0.00064(t' - 32)]$

P = absolute pressure, in. Hg, in duct

t = dry bulb temperature, °F

t' = wet bulb temperature, °F

This testing met the performance specifications as outlined in the Method.

## Method 6C Sulfur Dioxide (SO<sub>2</sub>) Determination

Stack gas SO<sub>2</sub> concentrations and emission rates were determined in accordance with USEPA Method 6C, 40CFR60, Appendix A. A Thermo Scientific Model 43i Pulsed Fluorescence Sulfur Dioxide Analyzer was used to determine sulfur dioxide concentrations, in the manner specified in the Method. The instrument operated in the nominal range of 0 ppm to 500 ppm with the specific range determined by the high-level span calibration gas of 480.3 ppm.

The Model 43i operates on the principle that SO<sub>2</sub> molecules absorb ultraviolet (UV) light and become excited at one wavelength, then decay to a lower energy state emitting UV light at a different wavelength. Specifically,



The sample is drawn into the Model 43i through the sample bulkhead. The sample flows through a hydrocarbon “kicker”, which removes hydrocarbons from the sample by forcing the hydrocarbon molecules to permeate through the tube wall. The SO<sub>2</sub> molecules pass through the hydrocarbon “kicker” unaffected.

The sample flows into the fluorescence chamber, where pulsating UV light excites the SO<sub>2</sub> molecules. The condensing lens focuses the pulsating UV light into the mirror assembly. The mirror assembly contains four selective mirrors that reflect only the wavelengths which excite SO<sub>2</sub> molecules.

As the excited SO<sub>2</sub> molecules decay to lower energy states, they emit UV light that is proportional to the SO<sub>2</sub> concentration. The bandpass filter allows only the wavelengths emitted by the excited SO<sub>2</sub> molecules to reach the photomultiplier tube (PMT). The PMT detects the UV light emission from the decaying SO<sub>2</sub> molecules. The photodetector, located at the back of the fluorescence chamber, continuously monitors the pulsating UV light source and is connected to a circuit that compensates for fluctuations in the lamp intensity.

As the sample leaves the optical chamber, it passes through a flow sensor, a capillary, and the “shell” side of the hydrocarbon kicker. The Model 43i outputs the SO<sub>2</sub> concentration to the front panel display, the analog outputs, and also makes the data available over the serial or Ethernet connection.

Stack gas was delivered to the analyzer through an EPM in-situ dilution sampling system. Stack gas concentrations were diluted at a nominal 100:1 ratio utilizing purified dilution air. The entire system was calibrated in accordance with the Method, using USEPA Protocol gases introduced at the probe, before and after each test run.

A list of calibration gases used and the results of all calibration and other required quality assurance checks are found in Appendix I. Copies of the gas cylinder certifications are found in Appendix J. This testing met the performance specifications as outlined in the Method.

RECEIVED

OCT 25 2022

AIR QUALITY DIVISION

## Method 7E Nitrogen Oxides (NO<sub>x</sub>) Determination

Stack gas NO<sub>x</sub> concentrations and emission rates were determined in accordance with USEPA Method 7E, 40CFR60, Appendix A. A Thermo Scientific Model 42i Chemiluminescence Nitrogen Oxides Analyzer was used to determine nitrogen oxides concentrations, in the manner specified in the Method. The instrument operated in the nominal range of 0 ppm to 500 ppm with the specific range determined by the high-level span calibration gas of 179.3 ppm.

The Model 42i High Level is based on the principle that nitric oxide (NO) and ozone (O<sub>3</sub>) react to produce a characteristic luminescence with an intensity linearly proportional to the NO concentration. Infrared light emission results when electronically excited nitrogen dioxide (NO<sub>2</sub>) molecules decay to lower energy states. Specifically,



NO<sub>2</sub> must first be transformed into NO before it can be measured using the chemiluminescent reaction. NO<sub>2</sub> is converted to NO by a molybdenum NO<sub>2</sub>-to-NO converter heated to about 326°C. The flue gas air sample is drawn into the Model 42i High Level through the sample bulkhead. The sample flows through a particulate filter, a capillary, and then to the mode solenoid valve. The solenoid valve routes the sample either straight to the reaction chamber (NO mode) or through the NO<sub>2</sub>-to-NO converter and then to the reaction chamber (NO<sub>x</sub> mode).

Dry air enters the Model 42i High Level through the dry air bulkhead, through a flow sensor, and then through a silent discharge ozonator. The ozonator generates the necessary ozone concentration needed for the chemiluminescent reaction. The ozone reacts with the NO in the ambient air sample to produce electronically excited NO<sub>2</sub> molecules. A photomultiplier tube (PMT) housed in a thermoelectric cooler detects the NO<sub>2</sub> luminescence.

The NO and NO<sub>x</sub> concentrations calculated in the NO and NO<sub>x</sub> modes are stored in memory. The difference between the concentrations are used to calculate the NO<sub>2</sub> concentration. The Model 42i High Level outputs NO, NO<sub>2</sub>, and NO<sub>x</sub> concentrations to both the front panel display and the analog outputs.

Stack gas was delivered to the analyzer through an EPM in-situ dilution sampling system. Stack gas concentrations were diluted at a nominal 100:1 ratio utilizing purified dilution air. The entire system was calibrated in accordance with the Method, using USEPA Protocol gases introduced at the probe, before and after each test run.

A list of calibration gases used and the results of all calibration and other required quality assurance checks are found in Appendix I. Copies of the gas cylinder certifications are found in Appendix J. The NO<sub>2</sub> to NO converter test can be found in Appendix K. This testing met the performance specifications as outlined in the Method.

### 3.0 TEST RESULT SUMMARIES

<b>Client:</b> Lansing Board of Water and Light				<b>Location:</b> Unit 1 Stack				
<b>Facility:</b> Erickson Station				<b>Date:</b> 9/8/22				
<b>Project #:</b> M223207				<b>Test Method:</b> 7E, 3A				
<b>Fuel Type:</b> Sub Bituminous Coal				<b>Fuel Factor:</b> 1840				
<b>NO<sub>x</sub> lb/mmBtu RATA</b>								
<b>CEM Analyzer Information</b>								
<b>NO<sub>x</sub> Monitor/Model:</b>		Teledyne Monitor Labs T200		<b>NO<sub>x</sub> Serial # :</b>		337		
<b>CO<sub>2</sub> Monitor/Model:</b>		Teledyne Monitor Labs T360M		<b>CO<sub>2</sub> Serial # :</b>		63		
1=accept 0=reject	Test Run	Test Date	Start Time	End Time	RM NO <sub>x</sub> lb/mmBtu	CEM NO <sub>x</sub> lb/mmBtu	(RM-CEM) Difference (di)	(RM-CEM) Difference <sup>2</sup> (di <sup>2</sup> )
1	1	09/08/22	10:45	11:05	0.132	0.132	0.000	0.000000
1	2	09/08/22	11:30	11:50	0.131	0.132	-0.001	0.000001
1	3	09/08/22	12:12	12:32	0.130	0.132	-0.002	0.000004
1	4	09/08/22	12:54	13:14	0.130	0.134	-0.004	0.000016
1	5	09/08/22	13:36	13:56	0.131	0.134	-0.003	0.000009
1	6	09/08/22	14:17	14:37	0.132	0.134	-0.002	0.000004
1	7	09/08/22	14:58	15:18	0.129	0.134	-0.005	0.000025
1	8	09/08/22	15:40	16:00	0.127	0.131	-0.004	0.000016
0	9	09/08/22	16:22	16:42	0.125	0.130	-0.005	0.000025
1	10	09/08/22	17:04	17:24	0.126	0.130	-0.004	0.000016
<b>n</b>					<b>9</b>			
<b>t(0.025)</b>					<b>2.306</b>			
<b>Mean Reference Method Value</b>					<b>0.130</b>		<b>RM avg</b>	
<b>Mean CEM Value</b>					<b>0.133</b>		<b>CEM avg</b>	
<b>Sum of Differences</b>					<b>-0.025</b>		<b>di</b>	
<b>Mean Difference</b>					<b>-0.003</b>		<b>d</b>	
<b>Sum of Differences Squared</b>					<b>0.000</b>		<b>di<sup>2</sup></b>	
<b>Standard Deviation</b>					<b>0.002</b>		<b>sd</b>	
<b>Confidence Coefficient 2.5% Error (1-tail)</b>					<b>0.001</b>		<b>cc</b>	
<b>Relative Accuracy</b>					<b>3.11</b>		<b>RA</b>	
<b>Bias Adjustment Factor</b>					<b>1.000</b>		<b>BAF</b>	

<b>Client:</b> Lansing Board of Water and Light					<b>Location:</b> Unit 1 Stack			
<b>Facility:</b> Erickson Station					<b>Date:</b> 9/8/22			
<b>Project #:</b> M223207					<b>Test Method:</b> 6C			
<b>SO<sub>2</sub> ppmv RATA</b>								
<b>CEM Analyzer Information</b>								
<b>SO<sub>2</sub> Monitor/Model:</b> Teledyne Monitor Labs T100H					<b>SO<sub>2</sub> Serial # :</b>		61	
<b>1=accept 0=reject</b>	<b>Test Run</b>	<b>Test Date</b>	<b>Start Time</b>	<b>End Time</b>	<b>RM SO<sub>2</sub> ppmv</b>	<b>CEM SO<sub>2</sub> ppmv</b>	<b>(RM-CEM) Difference (di)</b>	<b>(RM-CEM) Difference<sup>2</sup> (di<sup>2</sup>)</b>
1	1	09/08/22	10:45	11:05	206.8	211.4	-4.6	21.16
1	2	09/08/22	11:30	11:50	207.8	208.3	-0.5	0.25
0	3	09/08/22	12:12	12:32	200.9	206.8	-5.9	34.81
1	4	09/08/22	12:54	13:14	200.3	204.1	-3.8	14.44
1	5	09/08/22	13:36	13:56	200.5	204.6	-4.1	16.81
1	6	09/08/22	14:17	14:37	197.7	201.8	-4.1	16.81
1	7	09/08/22	14:58	15:18	196.9	202.1	-5.2	27.04
1	8	09/08/22	15:40	16:00	200.0	204.1	-4.1	16.81
1	9	09/08/22	16:22	16:42	199.5	205.1	-5.6	31.36
1	10	09/08/22	17:04	17:24	200.3	205.1	-4.8	23.04
<b>n</b>					<b>9</b>			
<b>t(0.025)</b>					<b>2.306</b>			
<b>Mean Reference Method Value</b>					<b>201.089</b>		<b>RM avg</b>	
<b>Mean CEM Value</b>					<b>205.178</b>		<b>CEM avg</b>	
<b>Sum of Differences</b>					<b>-36.800</b>		<b>di</b>	
<b>Mean Difference</b>					<b>-4.089</b>		<b>d</b>	
<b>Sum of Differences Squared</b>					<b>167.720</b>		<b>di<sup>2</sup></b>	
<b>Standard Deviation</b>					<b>1.468</b>		<b>sd</b>	
<b>Confidence Coefficient 2.5% Error (1-tail)</b>					<b>1.129</b>		<b>cc</b>	
<b>Relative Accuracy</b>					<b>2.59</b>		<b>RA</b>	
<b>Bias Adjustment Factor</b>					<b>1.000</b>		<b>BAF</b>	

<b>Client:</b> Lansing Board of Water and Light					<b>Location:</b> Unit 1 Stack			
<b>Facility:</b> Erickson Station					<b>Date:</b> 9/8/22			
<b>Project #:</b> M223207					<b>Test Method:</b> 3A			
<b>CO<sub>2</sub> % (wet) RATA</b>								
<b>CEM Analyzer Information</b>								
<b>CO2 Monitor/Model:</b>			Teledyne Monitor Labs T360M		<b>CO2 Serial # :</b>		63	
<b>1=accept 0=reject</b>	<b>Test Run</b>	<b>Test Date</b>	<b>Start Time</b>	<b>End Time</b>	<b>RM CO<sub>2</sub> % (wet)</b>	<b>CEM CO<sub>2</sub> % (wet)</b>	<b>(RM-CEM) Difference (di)</b>	<b>(RM-CEM) Difference<sup>2</sup> (di<sup>2</sup>)</b>
1	1	09/08/22	10:45	11:05	11.1	11.4	-0.3	0.09
1	2	09/08/22	11:30	11:50	11.3	11.5	-0.2	0.04
1	3	09/08/22	12:12	12:32	11.2	11.5	-0.3	0.09
1	4	09/08/22	12:54	13:14	11.2	11.5	-0.3	0.09
1	5	09/08/22	13:36	13:56	11.2	11.5	-0.3	0.09
1	6	09/08/22	14:17	14:37	11.1	11.5	-0.4	0.16
1	7	09/08/22	14:58	15:18	11.2	11.5	-0.3	0.09
1	8	09/08/22	15:40	16:00	11.1	11.5	-0.4	0.16
0	9	09/08/22	16:22	16:42	11.1	11.5	-0.4	0.16
1	10	09/08/22	17:04	17:24	11.2	11.5	-0.3	0.09
<b>n</b>					<b>9</b>			
<b>t(0.025)</b>					<b>2.306</b>			
<b>Mean Reference Method Value</b>					<b>11.178</b>		<b>RM avg</b>	
<b>Mean CEM Value</b>					<b>11.489</b>		<b>CEM avg</b>	
<b>Sum of Differences</b>					<b>-2.800</b>		<b>di</b>	
<b>Mean Difference</b>					<b>-0.311</b>		<b>d</b>	
<b>Sum of Differences Squared</b>					<b>0.900</b>		<b>di<sup>2</sup></b>	
<b>Standard Deviation</b>					<b>0.060</b>		<b>sd</b>	
<b>Confidence Coefficient 2.5% Error (1-tail)</b>					<b>0.046</b>		<b>cc</b>	
<b>Relative Accuracy</b>					<b>3.20</b>		<b>RA</b>	

Client: Lansing Board of Water & Light				Test Location: Unit 1 Stack					
Facility: Erickson				Test Date: 9/7/2022					
Project #: M223207				Test Method: 2					
<b>Volumetric Flow RATA - High(Normal) Load</b>									
<b>CEM Analyzer Information</b>									
Flow Monitor/Model:			Teledyne Ultraflow 150			Flow Serial # :		R-1108 1K-07 10	
1=accept 0=reject	Test Run	Test Date	Start Time	End Time	Reference Method Flow SCFH	CEM Flow SCFH	(RM-CEM) Difference (di)	(RM-CEM) Difference <sup>2</sup> (di <sup>2</sup> )	
0	1	09/07/22	11:27	11:37	19,102,000	19,917,000	-815,000	664,225,000,000	
1	2	09/07/22	11:40	11:55	19,640,000	20,053,000	-413,000	170,569,000,000	
1	3	09/07/22	12:15	12:25	19,728,000	20,062,000	-334,000	111,556,000,000	
1	4	09/07/22	12:40	12:55	20,206,000	19,991,000	215,000	46,225,000,000	
1	5	09/07/22	13:50	14:00	19,636,000	20,091,000	-455,000	207,025,000,000	
1	6	09/07/22	14:05	14:20	20,242,000	19,986,000	256,000	65,536,000,000	
1	7	09/07/22	15:20	15:30	19,322,000	20,062,000	-740,000	547,600,000,000	
1	8	09/07/22	15:35	15:50	20,210,000	20,095,000	115,000	13,225,000,000	
1	9	09/07/22	16:05	16:15	19,268,000	19,912,000	-644,000	414,736,000,000	
1	10	09/07/22	16:18	16:30	19,908,000	19,876,000	32,000	1,024,000,000	
n					9				
t(0.025)					2.306				
Mean Reference Method Value					19795555.556		RM avg		
Mean CEM Value					20014222.222		CEM avg		
Sum of Differences					-1968000.000		di		
Mean Difference					-218666.667		d		
Sum of Differences Squared					1577496000000.000		di <sup>2</sup>		
Standard Deviation					378675.323		sd		
Confidence Coefficient 2.5% Error (1-tail)					291075.098		cc		
Relative Accuracy					2.58		RA		
Bias Adjustment Factor					1.000		BAF		

Client: Lansing Board of Water & Light					Test Location: Unit 1 Stack			
Facility: Erickson					Test Date: 9/8/2022			
Project #: M223207					Test Method: 2			
<b>Volumetric Flow RATA - Low Load</b>								
<b>CEM Analyzer Information</b>								
Flow Monitor/Model: Teledyne Ultraflow 150					Flow Serial # : R-1108 1K-07 10			
1=accept 0=reject	Test Run	Test Date	Start Time	End Time	Reference Method Flow SCFH	CEM Flow SCFH	(RM-CEM) Difference (di)	(RM-CEM) Difference <sup>2</sup> (di <sup>2</sup> )
1	1	09/08/22	6:45	7:00	18,864,000	19,567,000	-703,000	494,209,000,000
1	2	09/08/22	7:02	7:15	18,874,000	19,493,000	-619,000	383,161,000,000
1	3	09/08/22	7:18	7:30	18,899,000	19,592,000	-693,000	480,249,000,000
0	4	09/08/22	7:45	8:00	18,647,000	19,589,000	-942,000	887,364,000,000
1	5	09/08/22	8:05	8:15	19,379,000	19,555,000	-176,000	30,976,000,000
1	6	09/08/22	8:20	8:30	19,340,000	19,521,000	-181,000	32,761,000,000
1	7	09/08/22	8:45	9:00	19,290,000	19,339,000	-49,000	2,401,000,000
1	8	09/08/22	9:05	9:15	19,126,000	19,465,000	-339,000	114,921,000,000
1	9	09/08/22	9:20	9:30	19,053,000	19,283,000	-230,000	52,900,000,000
1	10	09/08/22	9:45	9:55	19,392,000	19,304,000	88,000	7,744,000,000
n					9			
t(0.025)					2.306			
Mean Reference Method Value					19135222.222		RM avg	
Mean CEM Value					19457666.667		CEM avg	
Sum of Differences					-2902000.000		di	
Mean Difference					-322444.444		d	
Sum of Differences Squared					1599322000000.000		di <sup>2</sup>	
Standard Deviation					288007.861		sd	
Confidence Coefficient 2.5% Error (1-tail)					221382.042		cc	
Relative Accuracy					2.84		RA	
Bias Adjustment Factor					1.000		BAF	

## 4.0 CERTIFICATION

Mostardi Platt is pleased to have been of service to Lansing Board of Water and Light. If you have any questions regarding this test report, please do not hesitate to contact us at 630-993-2100.

As the program manager, I hereby certify that this test report represents a true and accurate summary of emissions test results and the methodologies employed to obtain those results. The test program was performed in accordance with the test protocol, test methods, the Mostardi Platt Quality Manual, and the ASTM D7036-12, as applicable.

MOSTARDI PLATT



Stuart L. Burton

Program Manager



Scott W. Banach

Quality Assurance

---

# APPENDICES

## Appendix A - Company AETB Certification



March 23, 2012

Effective immediately, Mostardi Platt self-certifies that all Part 75 test projects conform to the ASTM D 7036-04 Standard Practice. The following contact information is provided as required by the Standard:

Mostardi Platt  
888 Industrial Drive  
Elmhurst, Illinois 60126

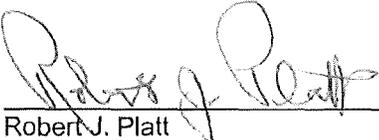
630-993-2100

[tplatt@mp-mail.com](mailto:tplatt@mp-mail.com)

Also, attached is a list of each Qualified Individual (QI) with the type of exam (e.g., Group I, II, III IV and/or V), the date the exam was taken and the name and email address of the exam provider.

Should you have any questions or need additional information, please contact Thomas Platt, P.E. at 630-993-2683.

Approved:

By:   
Robert J. Platt  
Chief Executive Officer

888 Industrial Drive  
Elmhurst, Illinois 60126  
630-993-2100

QSTI AETB Import Data

QJ Last Name [REQUIRED]	QI First Name [REQUIRED]	QI Middle Initial	AETB Name [REQUIRED]	AETB Phone Number [REQUIRED]	AETB Email [REQUIRED]	Exam Date mm/dd/yyyy [REQUIRED]	Exam Provider Name [REQUIRED]	Exam Provider Email [REQUIRED]	Comment
Burton	Stuart	L	Mostard Platt	630-993-2100	<a href="mailto:tplatt@mp-mail.com">tplatt@mp-mail.com</a>	1/4/2018	Source Evaluation Society	<a href="mailto:gstipogram@gmail.com">gstipogram@gmail.com</a>	Group V (Part 75)
Carlise	Robert	W	Mostard Platt	630-993-2100	<a href="mailto:tplatt@mp-mail.com">tplatt@mp-mail.com</a>	1/8/2021	Source Evaluation Society	<a href="mailto:gstipogram@gmail.com">gstipogram@gmail.com</a>	Group V (Part 75)
Colangelo	Nicholas	C	Mostard Platt	630-993-2100	<a href="mailto:tplatt@mp-mail.com">tplatt@mp-mail.com</a>	2/1/2019	Source Evaluation Society	<a href="mailto:gstipogram@gmail.com">gstipogram@gmail.com</a>	Group V (Part 75)
Coleman	Paul	F	Mostard Platt	630-993-2100	<a href="mailto:tplatt@mp-mail.com">tplatt@mp-mail.com</a>	3/15/2018	Source Evaluation Society	<a href="mailto:gstipogram@gmail.com">gstipogram@gmail.com</a>	Group V (Part 75)
Crivlare	Jeffrey	M	Mostard Platt	630-993-2100	<a href="mailto:tplatt@mp-mail.com">tplatt@mp-mail.com</a>	1/4/2018	Source Evaluation Society	<a href="mailto:gstipogram@gmail.com">gstipogram@gmail.com</a>	Group V (Part 75)
Ehlers	Eric	L	Mostard Platt	630-993-2100	<a href="mailto:tplatt@mp-mail.com">tplatt@mp-mail.com</a>	1/17/2018	Source Evaluation Society	<a href="mailto:gstipogram@gmail.com">gstipogram@gmail.com</a>	Group V (Part 75)
Eldridge	Christopher	S	Mostard Platt	630-993-2100	<a href="mailto:tplatt@mp-mail.com">tplatt@mp-mail.com</a>	2/18/2021	Source Evaluation Society	<a href="mailto:gstipogram@gmail.com">gstipogram@gmail.com</a>	Group V (Part 75)
Gross	Jeffrey	M	Mostard Platt	630-993-2100	<a href="mailto:tplatt@mp-mail.com">tplatt@mp-mail.com</a>	11/20/2018	Source Evaluation Society	<a href="mailto:gstipogram@gmail.com">gstipogram@gmail.com</a>	Group V (Part 75)
Hendricks	Benjamin	W	Mostard Platt	630-993-2100	<a href="mailto:tplatt@mp-mail.com">tplatt@mp-mail.com</a>	1/30/2020	Source Evaluation Society	<a href="mailto:gstipogram@gmail.com">gstipogram@gmail.com</a>	Group V (Part 75)
Howe	Jacob	W	Mostard Platt	630-993-2100	<a href="mailto:tplatt@mp-mail.com">tplatt@mp-mail.com</a>	2/17/2021	Source Evaluation Society	<a href="mailto:gstipogram@gmail.com">gstipogram@gmail.com</a>	Group V (Part 75)
Jensen	Christopher	E	Mostard Platt	630-993-2100	<a href="mailto:tplatt@mp-mail.com">tplatt@mp-mail.com</a>	1/4/2018	Source Evaluation Society	<a href="mailto:gstipogram@gmail.com">gstipogram@gmail.com</a>	Group V (Part 75)
Jones	Kyle	L	Mostard Platt	630-993-2100	<a href="mailto:tplatt@mp-mail.com">tplatt@mp-mail.com</a>	1/11/2021	Source Evaluation Society	<a href="mailto:gstipogram@gmail.com">gstipogram@gmail.com</a>	Group V (Part 75)
Kaschinske	Jordan	R	Mostard Platt	630-993-2100	<a href="mailto:tplatt@mp-mail.com">tplatt@mp-mail.com</a>	1/8/2021	Source Evaluation Society	<a href="mailto:gstipogram@gmail.com">gstipogram@gmail.com</a>	Group V (Part 75)
Kossack	Daniel	J	Mostard Platt	630-993-2100	<a href="mailto:tplatt@mp-mail.com">tplatt@mp-mail.com</a>	11/11/2021	Source Evaluation Society	<a href="mailto:gstipogram@gmail.com">gstipogram@gmail.com</a>	Group V (Part 75)
Kukla	Joshua	R	Mostard Platt	630-993-2100	<a href="mailto:tplatt@mp-mail.com">tplatt@mp-mail.com</a>	1/4/2019	Source Evaluation Society	<a href="mailto:gstipogram@gmail.com">gstipogram@gmail.com</a>	Group V (Part 75)
Lipinski	Michal		Mostard Platt	630-993-2100	<a href="mailto:tplatt@mp-mail.com">tplatt@mp-mail.com</a>	1/31/2020	Source Evaluation Society	<a href="mailto:gstipogram@gmail.com">gstipogram@gmail.com</a>	Group V (Part 75)
McGough	Scott	W	Mostard Platt	630-993-2100	<a href="mailto:tplatt@mp-mail.com">tplatt@mp-mail.com</a>	2/27/2018	Source Evaluation Society	<a href="mailto:gstipogram@gmail.com">gstipogram@gmail.com</a>	Group V (Part 75)
Panek	Damian	P	Mostard Platt	630-993-2100	<a href="mailto:tplatt@mp-mail.com">tplatt@mp-mail.com</a>	1/19/2021	Source Evaluation Society	<a href="mailto:gstipogram@gmail.com">gstipogram@gmail.com</a>	Group V (Part 75)
Peterson	Mark	E	Mostard Platt	630-993-2100	<a href="mailto:tplatt@mp-mail.com">tplatt@mp-mail.com</a>	1/4/2018	Source Evaluation Society	<a href="mailto:gstipogram@gmail.com">gstipogram@gmail.com</a>	Group V (Part 75)
Petrovich	William	A	Mostard Platt	630-993-2100	<a href="mailto:tplatt@mp-mail.com">tplatt@mp-mail.com</a>	2/4/2022	Source Evaluation Society	<a href="mailto:gstipogram@gmail.com">gstipogram@gmail.com</a>	Group V (Part 75)
Russ	Timothy	E	Mostard Platt	630-993-2100	<a href="mailto:tplatt@mp-mail.com">tplatt@mp-mail.com</a>	4/8/2020	Source Evaluation Society	<a href="mailto:gstipogram@gmail.com">gstipogram@gmail.com</a>	Group V (Part 75)
Sands	Stuart	T	Mostard Platt	630-993-2100	<a href="mailto:tplatt@mp-mail.com">tplatt@mp-mail.com</a>	1/4/2018	Source Evaluation Society	<a href="mailto:gstipogram@gmail.com">gstipogram@gmail.com</a>	Group V (Part 75)
Sather	Michael	P	Mostard Platt	630-993-2100	<a href="mailto:tplatt@mp-mail.com">tplatt@mp-mail.com</a>	2/7/2020	Source Evaluation Society	<a href="mailto:gstipogram@gmail.com">gstipogram@gmail.com</a>	Group V (Part 75)
Simon	Ryan	K	Mostard Platt	630-993-2100	<a href="mailto:tplatt@mp-mail.com">tplatt@mp-mail.com</a>	1/4/2018	Source Evaluation Society	<a href="mailto:gstipogram@gmail.com">gstipogram@gmail.com</a>	Group V (Part 75)
Sollars	Richard	J	Mostard Platt	630-993-2100	<a href="mailto:tplatt@mp-mail.com">tplatt@mp-mail.com</a>	9/9/2016	Source Evaluation Society	<a href="mailto:gstipogram@gmail.com">gstipogram@gmail.com</a>	Group V (Part 75)
Sorce	Angelo	M	Mostard Platt	630-993-2100	<a href="mailto:tplatt@mp-mail.com">tplatt@mp-mail.com</a>	2/18/2022	Source Evaluation Society	<a href="mailto:gstipogram@gmail.com">gstipogram@gmail.com</a>	Group V (Part 75)
Spoolstra	Ryan	N	Mostard Platt	630-993-2100	<a href="mailto:tplatt@mp-mail.com">tplatt@mp-mail.com</a>	2/7/2020	Source Evaluation Society	<a href="mailto:gstipogram@gmail.com">gstipogram@gmail.com</a>	Group V (Part 75)
Trezak	Christopher	S	Mostard Platt	630-993-2100	<a href="mailto:tplatt@mp-mail.com">tplatt@mp-mail.com</a>	4/14/2020	Source Evaluation Society	<a href="mailto:gstipogram@gmail.com">gstipogram@gmail.com</a>	Group V (Part 75)

9/19/2022

## Appendix B - QI Certification(s) for Field Personnel



**Qualified Individual**

***Stuart L. Burton***

Has satisfactorily completed the requirements of

**ASTM D 7036 – 04, Section 8.3**

**Standard Practice for Competence of Air Emission Testing Bodies**

Examinations provided by Source Evaluation Society: [www.sesnews.org](http://www.sesnews.org), (919) 544-6338

All Part 75 test methods, under my supervision, shall conform to the company's Quality Manual and to this practice, in all respects.

Passed Group V Exam on 1/4/2018

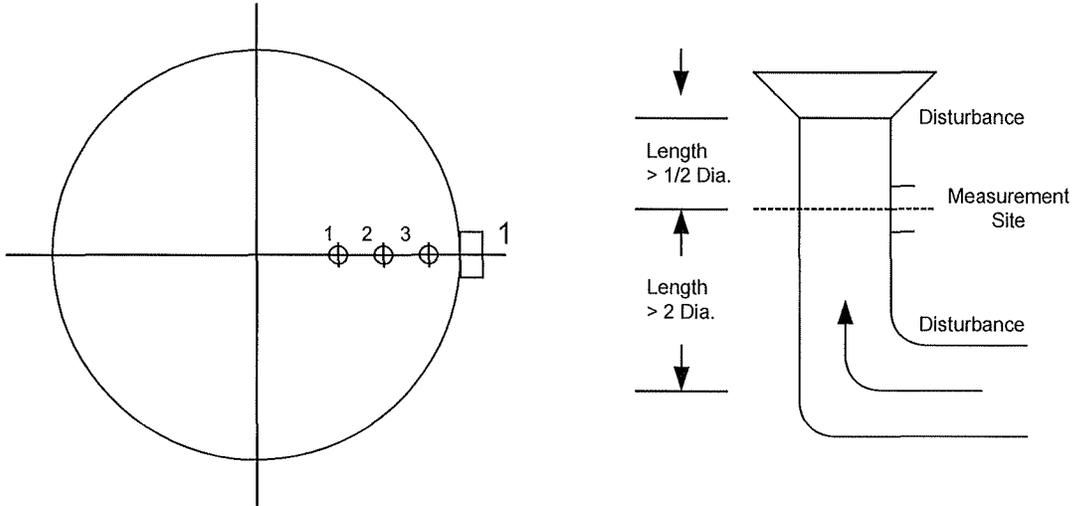
Expiration Date: 1/4/2023

Signature: *Stuart L. Burton* Date: 2-23-18

Quality Manager: *Thomas S. Platt* Technical Director: *Kevin Barack*

## Appendix C - Test Section Diagrams

## GASEOUS TRAVERSE FOR ROUND DUCTS



Job: Lansing Board of Water and Light  
 Erickson Station  
 Lansing, Michigan

Distance from inside wall  
 at port to traverse point:

Date: September 8, 2022

1. 6.56 Feet (2.0 Meters)
2. 3.94 Feet (1.2 Meters)
3. 1.31 Feet (0.4 Meters)

Test Location: Unit 1 Stack

Stack Diameter (Feet): 17.0

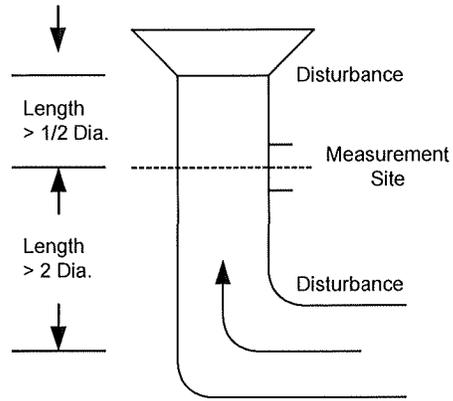
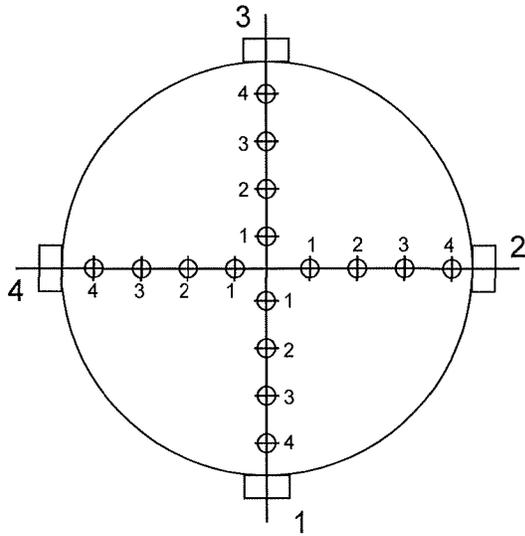
Stack Area (Square Feet): 226.98

No. Sample Points: 3

No of Ports: 1

Port Length (Inches): 78.0

## EQUAL AREA TRAVERSE FOR ROUND DUCTS



Job: Lansing Board of Water and Light  
Erickson Station  
Lansing, Michigan

Date: September 7 and 8, 2022

Test Location: Unit 1 Stack

Stack Diameter (Feet): 17.0

Stack Area (Square Feet): 226.98

No. Sample Points Across Diameter: 8

No. of Ports 4

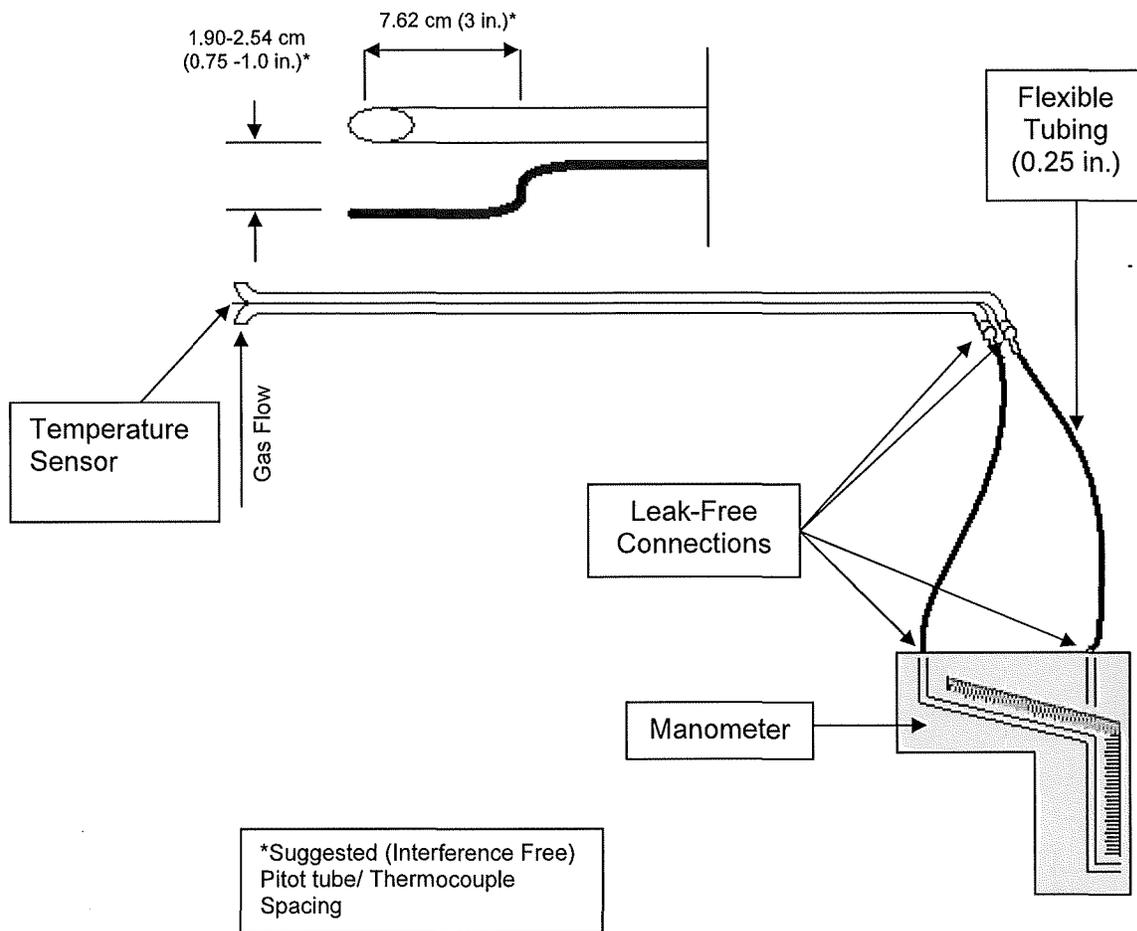
Port Length (Inches): 78.0

Distance from inside wall  
at port to traverse point:

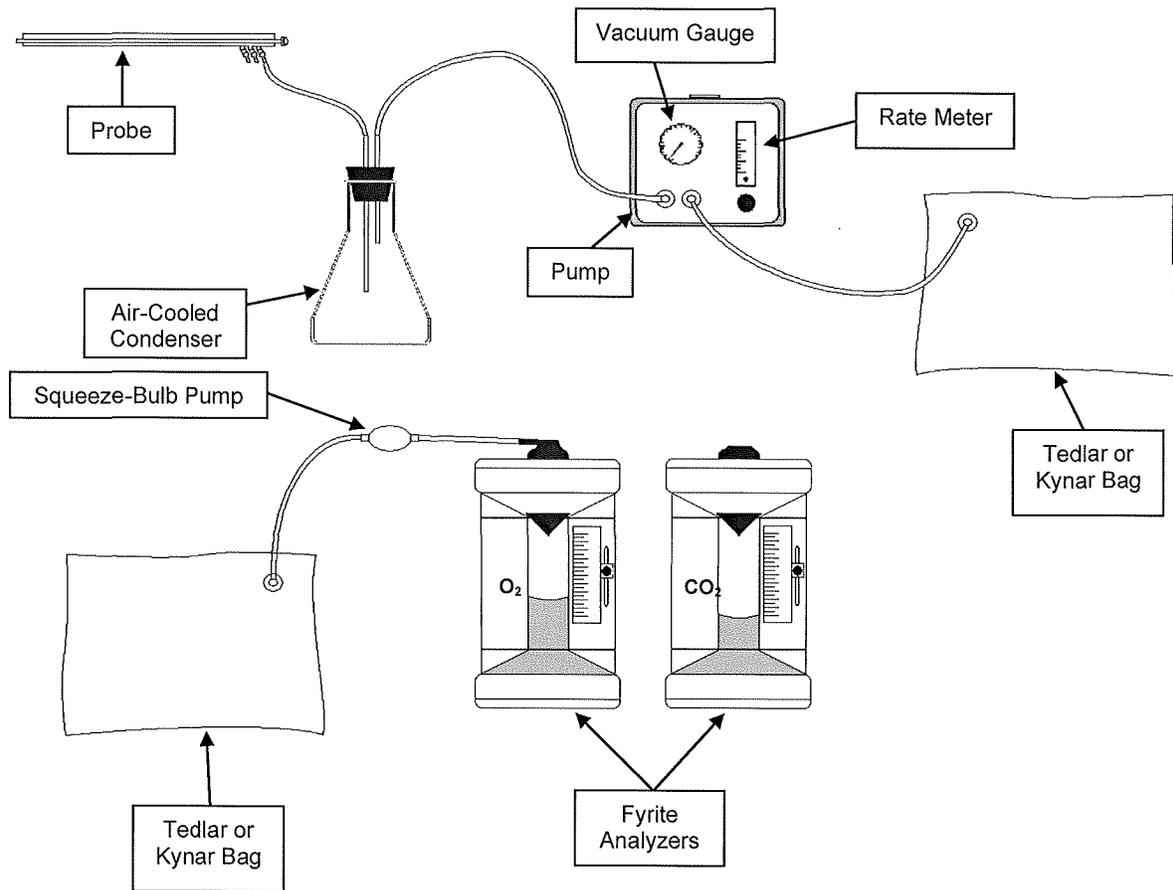
1. 5.49 Feet (32.3 % of diameter)
2. 3.30 Feet (19.4 % of diameter)
3. 1.79 Feet (10.5 % of diameter)
4. 0.54 Feet (3.2 % of diameter)

## Appendix D - Sample Train Diagrams

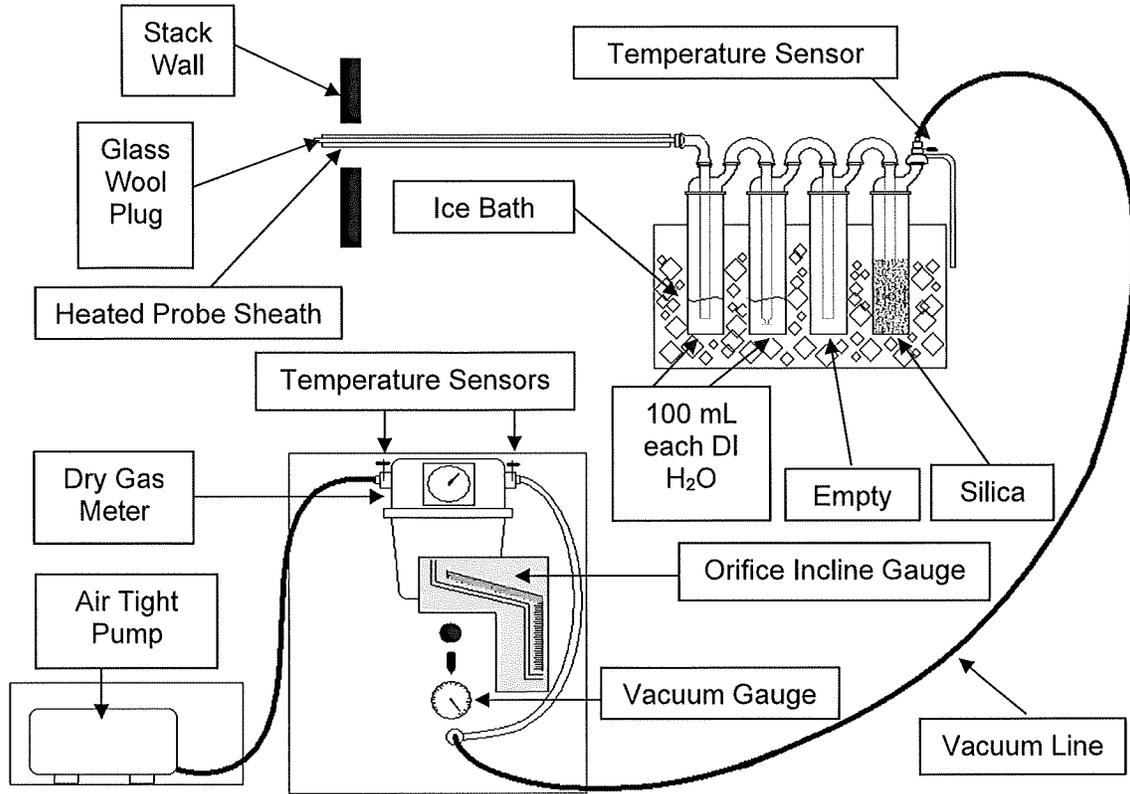
## USEPA Method 2 – Type S Pitot Tube Manometer Assembly



# USEPA Method 3 - Integrated Oxygen/Carbon Dioxide Sample Train Diagram Utilizing Fyrite Gas Analyzer



# USEPA Method 4- Moisture Content Sample Train Diagram



# USEPA Methods 3A, 6C, and 7E - Dilution Probe Gaseous Sample Train Diagram

