FINAL REPORT

WASHINGTON 10 STORAGE CORPORATION

WASHINGTON TOWNSHIP, MICHIGAN

WASHINGTON 10 COMPRESSOR STATION: FGENGINES2 EMISSIONS REPORT – RETEST

RWDI #2403298

November 27, 2024

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EXECUTIVE SUMMARY

RWDI USA LLC (RWDI) was retained by Washington 10 Storage Corporation (Washington 10) to complete a re-test emission sampling program at the Washington 10 Compressor Station located at 12700 30 Mile Rd, Washington Township, Michigan. The facility operates under the State of Michigan Department of Environment, Great Lakes and Energy (EGLE) Renewable Operating Permit (ROP) MI-ROP-N3391-2023. Under the ROP, the facility operates three (3) 4,000 HP natural gas fired reciprocating engines used to drive natural gas compressors for transport between storage field and pipeline system under Flexible Group FG-ENGINES1 and three (3) 4-stroke lean-burn, 4,735 HP Caterpillar natural gas fired reciprocating engines under Flexible Group FG-ENGINES2. The engines generate line pressure assisting the transmission of natural gas into and out of the gas storage field as well as to and from the pipeline transmission system in Southeast Michigan.

The re-test was requested by EGLE under the Notice of Violation for failure to operate the emission units of EUENGINE4 and EUENGINE2 at the permit required loads during the testing program completed in June of 2024.

The re-test program included the following:

- CO Destruction Efficiency (DE) testing from EUENGINE4 under Flexible Group FG-ENGINES2 to validate that the catalyst is capable of achieving a 93% destruction efficiency (or greater) as per 40 CFR Part 63 Subparts A and ZZZZ.
- Testing at the outlet of EU-ENGINE2 under Flexible Group FG-ENGINES1 at 100% Torque for Carbon Monoxide (CO), Oxides of Nitrogen (NOx), and Non-Methane Organic Compounds (NMOC)

Executive Table i: EUENGINE4 CO Destruction Efficiency & Inlet Emission Rates

Unit	Carbon Monoxide	
	Destruction Efficiency (%)	Pre-Catalyst g/hp-hr
EUENGINE4	98.8	2.0
Permit Limit	Min. 93.0	Max. 2.5

Executive Table ii: EUENGINE2 –CO, NOx & NMOC Emission Rates at 100% Torque

Unit	Carbon Monoxide	Oxides of Nitrogen	NMOC
	g/hp-hr	g/hp-hr	g/hp-hr
EUENGINE2	1.35	0.85	0.14
Permit Limit	2.0	1.3	0.9

TABLE OF CONTENTS

1 INTRODUCTION 1
1.1 Location and Dates of Testing 1
1.2 Purpose of Testing 1
1.3 Description of Source 1
1.4 Personnel Involved in Testing 2
2 SUMMARY OF RESULTS 2
2.1 Operating Data 2
2.2 Applicable Permit Number 2
3 SOURCE DESCRIPTION 3
3.1 Description of Process and Emission Control Equipment 3
3.2 Process Flow Sheet or Diagram (if applicable) 3
3.3 Type and Quantity of Raw and Finished Materials 3
3.4 Normal Rated Capacity of Process 3
4 SAMPLING AND ANALYTICAL PROCEDURES 3
4.1 Description of Sampling Train and Field Procedures 3
4.1.1 Carbon Monoxide, Oxides of Nitrogen, and Oxygen 3
4.1.2 Non-Methane Organic Compounds 4
4.1.3 Verification of Gas Dilution Systems for Field Instrument Calibration 5
4.1.4 Determination of Moisture Content 5
4.2 Description of Recovery and Analytical Procedures 5
4.3 Sampling Port Description 5
5 TEST RESULTS AND DISCUSSION 6
5.1 Detailed Results 6
5.2 Discussion of Results 6
5.3 Variations in Testing Procedures 6
5.4 Process Upset Conditions During Testing 6
5.5 Maintenance Performed in Last Three Months 6
5.6 Re-Test 6
5.7 Audit Samples 7
5.8 Field Data Sheets 7
5.9 Calibration Data 7
5.10 Example Calculations 7
5.11 Laboratory Data 7

LIST OF TABLES (IN REPORT BODY)

Table 1.4.1: List of Testing Personnel 2
Table 5.1.1: EUENGINE4 CO Reduction Efficiency & Inlet Emission Rates 6
Table 5.1.2: EUENGINE2 CO, NOx & NMOC Emission Rates at 100% Torque 6

LIST OF TABLES (IN TABLE SECTION)

Table 1: Summary of Sampling Parameters and Methodology
Table 2: Sampling Time Summary
Table 3: EUENGINE4 CO DE Testing Summary
Table 4: EUENGINE2 at 100% Torque CO Testing Summary
Table 5: EUENGINE2 at 100% Torque NOx and NMOC Testing Summary

LIST OF FIGURES

Figure 1: USEPA Method 3A, 7E, 10
Figure 2: USEPA Method 25A
Figure 3: USEPA Method 4
Figure 4: Stack Figure Engines 4
Figure 5: Stack Figure Engines 2

LIST OF APPENDICES

Appendix A: Process Data
- **Appendix A1:** Natural Gas Sample
- **Appendix A2:** EUENGINE4 - Process Data
- **Appendix A3:** EUENGINE2 - Process Data

Appendix B: CEMS Data
- **Appendix B1:** EUENGINE4 - CEMS Data
- **Appendix B2:** EUENGINE2 - CEMS Data

Appendix C: Field Notes
- **Appendix C1:** EUENGINE4 – Field Notes
- **Appendix C2:** EUENGINE2 – Field Notes

Appendix D: Equipment Calibrations
Appendix E: Example Calculations
Appendix F: EGLE Correspondence and Source Testing Plan

1 INTRODUCTION

RWDI USA LLC (RWDI) was retained by Washington 10 Storage Corporation (Washington 10) to complete a re-test emission sampling program at the Washington 10 Compressor Station located at 12700 30 Mile Rd, Washington Township, Michigan. The facility operates under the State of Michigan Department of Environment, Great Lakes and Energy (EGLE) Renewable Operating Permit (ROP) MI-ROP-N3391-2023. Under the ROP, the facility operates three (3) 4,000 HP natural gas fired reciprocating engines used to drive natural gas compressors for transport between storage field and pipeline system under Flexible Group FG-ENGINES1 and three (3) 4-stroke lean-burn, 4,735 HP Caterpillar natural gas fired reciprocating engines under Flexible Group FG-ENGINES2. The engines generate line pressure assisting the transmission of natural gas into and out of the gas storage field as well as to and from the pipeline transmission system in Southeast Michigan.

The re-test was requested by EGLE under the Notice of Violation for failure to operate the emission units of EUENGINE4 and EUENGINE2 at the permit required loads during the testing program completed in June of 2024.

The re-test program included the following:

- CO Destruction Efficiency (DE) testing from EUENGINE4 under Flexible Group FG-ENGINES2 to validate that the catalyst is capable of achieving a 93% destruction efficiency (or greater) as per 40 CFR Part 63 Subparts A and ZZZZ.
- Testing at the outlet of EU-ENGINE2 under Flexible Group FG-ENGINES1 at 100% Torque for Carbon Monoxide (CO), Oxides of Nitrogen (NOx), and Non-Methane Organic Compounds (NMOC)

1.1 Location and Dates of Testing

The test program took place on October 17th, 2024.

1.2 Purpose of Testing

This testing was conducted to show compliance with MI-ROP-N3391-2023 and 40 CFR Part 63 Subpart ZZZZ.

1.3 Description of Source

The facility operates three (3) 4,000 HP natural gas fired reciprocating engines used to drive natural gas compressors for transport between storage field and pipeline system under Flexible Group FG-ENGINES1 and three (3) 4-stroke lean-burn, 4,735 HP Caterpillar natural gas fired reciprocating engines under Flexible Group FG-ENGINES2. The engines generate line pressure assisting the transmission of natural gas into and out of the gas storage field as well as to and from the pipeline transmission system in southeast Michigan.

1.4 Personnel Involved in Testing

Table 1.4.1: Testing Personnel

Jillian Cellini Air Quality Analyst Cellinij1@michigan.gov	State of Michigan Department of Environment, Great Lakes and Energy (EGLE) Air Quality Division	(586) 234-2337
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2 SUMMARY OF RESULTS

2.1 Operating Data

Operating parameters used to regulate the compressor engines include speed (RPM) and torque (HP). Additional parameters monitored include fuel flow, inlet & exhaust temperature & pressure, timing, and fuel analysis. Operating parameters for each test can be found in **Appendix A**.

2.2 Applicable Permit Number

MI-ROP-N3391-2023 and 40 CFR Part 63 Subpart ZZZZ.

3 SOURCE DESCRIPTION

3.1 Description of Process and Emission Control Equipment

EUENGINE1-6 are equipped with an oxidation catalyst which controls emissions.

3.2 Process Flow Sheet or Diagram (if applicable)

A process flow diagram is available upon request.

3.3 Type and Quantity of Raw and Finished Materials

EUENGINE1-6 are natural gas-fired reciprocating units.

3.4 Normal Rated Capacity of Process

The engines are rated at 4,000 or 4,735 HP and were ran at maximum achievable load.

4 SAMPLING AND ANALYTICAL PROCEDURES

4.1 Description of Sampling Train and Field Procedures

4.1.1 Carbon Monoxide, Oxides of Nitrogen, and Oxygen

CO, NOx, and O_2 concentrations were determined utilizing RWDI's continuous emissions monitoring (CEM) system. Prior to testing, a 3-point analyzer calibration error check was conducted using USEPA protocol gases. The calibration error check was performed by introducing zero, mid and high-level calibration gases directly into the analyzer. The calibration error check was performed to confirm that the analyzer response was within ±2% of the certified calibration gas introduced. Prior to each test run, a system-bias test was performed where known concentrations of calibration gases were introduced at the probe tip to measure if the analyzers response was within ±5% of the introduced calibration gas concentrations. At the conclusion of each test run a system-bias check was performed to evaluate the percent drift from pre and post-test system bias checks. The system bias checks were used to confirm that the analyzer did not drift greater than ±3% throughout each test run.

Zero and upscale calibration checks were conducted both before and after each test run to quantify measurement system calibration drift and sampling system bias. Upscale is either the mid- or high-range gas, whichever most closely approximates the flue gas level. During these checks, the calibration gases were introduced into the sampling system at the probe outlet so that the calibration gases were analyzed in the same manner as the flue gas samples.

A gas sample was continuously extracted from the stack and delivered to a series of gas analyzers, which measure the pollutant or diluent concentrations in the gas. The analyzers were calibrated on-site using EPA Protocol No. 1 certified calibration mixtures. The probe tip was equipped with a sintered stainless-steel filter for particulate removal. The end of the probe was connected to a heated Teflon sample line, which delivered the sample gases from the stack to the CEM system. The heated sample line was designed to maintain the gas temperature above 250°F to prevent condensation of stack gas moisture within the line.

Before entering the analyzers, the gas sample passed directly into a refrigerated condenser, which cools the gas to approximately 35°F to remove the stack gas moisture. After passing through the condenser, the dry gas entered a Teflon-head diaphragm pump and a flow control panel, which delivered the gas in series to the CO, NO_x and O_2 analyzers. Each of these analyzers measure the respective gas concentrations on a dry volumetric basis.

4.1.2 Non-Methane Organic Compounds

Non-Methane Organic Compounds (as propane) for VOCs and CH_4 concentrations were recorded simultaneously for each test. The measurements were taken continuously following USEPA Method 25A on each engine (using a non-methane/methane analyzer).

Prior to testing, a 4-point analyzer calibration error check was conducted using USEPA protocol gases. The calibration error check was performed by introducing zero, low, mid, and high-level calibration gases up the heated line to the probe tip. The calibration error check was performed to confirm that the analyzer response is within ±5% of the certified calibration gas introduced. At the conclusion of each test run a system-bias check was performed to evaluate the percent drift from pre- and post-test system bias checks. The system bias check was used to confirm that the analyzer did not drift greater than ±3% throughout a test run.

Zero and mid gas calibration checks were conducted both before and after each test run to quantify measurement system calibration drift and sampling system bias. During these checks, the calibration gases were introduced into the sampling system at the probe tip so that the calibration gases were analyzed in the same manner as the flue gas samples.

A gas sample was continuously extracted from the stack and delivered to the gas analyzer, which measures the pollutant or diluent concentrations in the gas. The end of the probe was connected to a heated Teflon sample line, which delivered the sample gases from the stack to the CEM system. The heated sample line is designed to maintain the gas temperature above 250°F to prevent condensation of stack gas moisture within the line.

To subtract methane from THC, the methane must be converted from methane as methane to methane as propane and then subtracted from the THC number. The methane response factor (RF) is used in the conversion and is determined each test by introducing a known methane concentration to the analyzer and dividing the methane channel response by the THC channel response. Dividing methane by the RF gives methane as propane and is then subtracted from the THC concentration.

4.1.3 Verification of Gas Dilution Systems for Field Instrument Calibration

Calibration gas was mixed using an Environics 4040 Gas Dilution System. The mass flow controllers are factory calibrated using a primary flow standard traceable to the United States National Institute of Standards and Technology (NIST). Each flow controller utilizes an 11-point calibration table with linear interpolation, to increase accuracy and reduce flow controller nonlinearity. The calibration is done yearly, and the records are included in the Source Testing Report**.** A multi-point EPA Method 205 check was executed in the field prior to testing to ensure accurate gas mixtures. The gas dilution system consists of calibrated orifices for mass flow controllers and dilutes a high-level calibration gas to within ±2% of predicted values. The gas divider is capable of diluting gases at set increments and was evaluated for accuracy in the field in accordance with US EPA Method 205 "*Verification of Gas Dilution Systems for Field Instrument Calibrations*". The gas divider dilutions were measured to evaluate that the responses are within ±2% of predicted values. In addition, a certified mid-level calibration gas within ±10% of one of the tested dilution gases was introduced into an analyzer to ensure the response of the gas calibration was within ±2% of gas divider dilution concentration.

4.1.4 Determination of Moisture Content

Moisture content was determined for each test on EUENGINE2 by following USEPA Method 4. A sample of gas was drawn through a series of impingers to condense water out of the air sample. The impingers were analyzed gravimetrically before and after each test to determine the moisture content of the sample.

4.2 Description of Recovery and Analytical Procedures

There were no samples to recover during this test program. All testing used real time data from the analyzers.

4.3 Sampling Port Description

A figure of the testing sites is provided in the **Figures** section.

5 TEST RESULTS AND DISCUSSION

5.1 Detailed Results

The following tables give the averages for each permit requirement. The **Tables** section and **Appendix B** provide a detailed breakdown of each test.

Table 5.1.1: EUENGINE4 CO Reduction Efficiency & Inlet Emission Rates

Unit	Carbon Monoxide	
	Destruction Efficiency (%)	Pre-Catalyst g/hp-hr
EUENGINE4	98.8	2.0
Permit Limit	Min. 93.0	Max. 2.5

Table 5.1.2: EUENGINE2 –CO, NOx & NMOC Emission Rates at 100% Torque

Unit	Carbon Monoxide	Oxides of Nitrogen	NMOC
	g/hp-hr	g/hp-hr	g/hp-hr
EUENGINE2	1.35	0.85	0.14
Permit Limit	2.0	1.3	0.9

5.2 Discussion of Results

EUENGINE4 was verified to meet the CO Destruction Efficiency and the CO emission limits (g/hp-hr) while operating at greater than 90% load. EUENGINE2 was verified to meet the CO, NO_x and NMOC permit limits while operation at 100% torque and 100% load.

5.3 Variations in Testing Procedures

None

5.4 Process Upset Conditions During Testing

There were normal process breaks during production.

5.5 Maintenance Performed in Last Three Months

Regular maintenance is performed monthly.

5.6 Re-Test

The re-test was requested by EGLE under the Notice of Violation for failure to operate the emission units of EUENGINE4 and EUENGINE2 at the permit required loads during the testing program completed in June of 2024.

5.7 Audit Samples

This test did not require any audit samples.

5.8 Field Data Sheets

Field data sheets can be found in **Appendix C**.

5.9 Calibration Data

Calibration data can be found in **Appendix D**.

5.10 Example Calculations

Example calculations can be found in **Appendix E**.

5.11 Laboratory Data

There was no laboratory data from this testing program.

TABLES

Table 1: Summary of Sampling Parameters and Methodology

Source Location	No. of Tests per Stack	Sampling Parameter	Sampling Method
EUENGINE4	3	Oxygen	U.S. EPA [1] Method 3A
	3	Carbon Monoxide	U.S. EPA [1] Method 10
EUENGINE2 100% Torque	3	Oxygen	U.S. EPA [1] Method 3A
	3	Moisture Content	U.S. EPA [1] Method 4
	3	Carbon Monoxide	U.S. EPA [1] Method 10
	3	Oxides of Nitrogen	U.S. EPA [1] Method 7E
	3	Non-Methane Organic Compounds	U.S. EPA [1] Method 25A

Notes:

[1] U.S. EPA - United States Environmental Protection Agency

Table 2: Sampling Time Summary

Source and Test #	Sampling Date	Start Time	End Time
EUENGINE4			
Test #1	17-Oct-24	8:55 AM	9:54 AM
Test #2	17-Oct-24	10:20 AM	11:19 AM
Test #3	17-Oct-24	11:50 AM	12:49 PM
EUENGINE2 - 100% Torque			
Test #1	17-Oct-24	9:20 AM	10:19 AM
Test #2	17-Oct-24	10:50 AM	11:49 AM
Test #3	17-Oct-24	12:20 PM	1:19 PM

Table 3 - EUENGINE4 CO Testing Summary

RWDI Project #2403298

				O_2		CO		CO Emission Rate				Natural Gas Usage	Natural Gas Usage
Test ID	Date	Start	End	%		ppm		lbs/mmBTU		lbs/hr		MMBTU/hr	ft^3/hr
				Inlet	Outlet	Inlet	Outlet	Inlet	Outlet	Inlet	Outlet		
1	2024-10-17	8:55	9:54	11.5	11.4	404.2	5.1	0.57	0.007	18.2	0.23	32.0	30,000
2	2024-10-17	10:20	11:19	11.7	11.6	427.3	5.0	0.61	0.007	20.2	0.23	33.0	31,000
3	2024-10-17	11:50	12:49	11.7	11.6	407.7	4.8	0.59	0.007	19.4	0.23	33.0	31,000
		Average		11.6	11.5	413.1	5.0	0.59	0.007	19.2	0.23	32.7	30,667

	Horsepower	CO Emission Rate		DE
Test ID	bhp	g/bhp-hr		%
		Inlet	Outlet	
1	4282	1.92	0.024	98.7%
2	4404	2.08	0.024	98.9%
3	4422	1.99	0.023	98.8%
Average	4370	2.00	0.024	98.8%

MMBTU = 1066.05 BTU/sft3 natural gas x ft3 of natural gas x 1 MMBTU/1,000,000 BTU

lb/MMBTU =CO ppm x 0.0000000726 x 8710 x (20.9/20.9-Actual O2)

Table 4: EUENGINE2 100% Torque and Power CO Testing Summary

RWDI Project #2403298

				O_2	CO	CO Emission Rate			Natural Gas Usage		
Test ID	Date	Start	End	%	ppm	lbs/mmBTU	lbs/hr	g/hp-hr	MMBTU/hr	ft^3/hr	
				Outlet	Outlet	Outlet	Outlet	Outlet			
1	2024-10-17	9:20	10:19	16.7	144.9	0.4540	10.65	1.342	23.5	22,000	
2	2024-10-17	10:50	11:49	16.6	148.6	0.4552	10.68	1.351	23.5	22,000	
3	2024-10-17	12:20	13:19	16.6	141.6	0.4367	10.71	1.344	24.5	23,000	
		Average		16.6	145.1	0.4486	10.68	1.346	24.0	22,500	2.0 g/hp-hr

lb/MMBTU =CO ppm x 0.0000000726 x 8710 x (20.9/20.9-Actual O2)

MMBTU = 1066.05 BTU/sft3 natural gas x ft3 of natural gas x 1 MMBTU/1,000,000 BTU

Table 5: EUENGINE2 100% Torque / Power NOx and NMOC Testing Summary

RWDI Project #2403298

				O_2	NOx	NOx Emission Rate			Natural Gas Usage		
Test ID	Date	Start	End	%	ppm	lbs/mmBTU	lbs/hr	g/hp-hr	MMBTU/hr	ft^3/hr	
				Outlet	Outlet	Outlet	Outlet	Outlet			
1	2024-10-17	9:20	10:19	16.7	46.2	0.2382	5.59	0.704	23.5	22,000	
2	2024-10-17	10:50	11:49	16.6	52.1	0.2623	6.15	0.770	23.5	22,000	
3	2024-10-17	12:20	13:19	16.6	60.1	0.3050	7.48	0.939	24.5	23,000	
		Average		16.6	56.1	0.2837	6.82	0.854	24.0	22,500	**1.3 g/hp-hr**

				O_2	THC (as propane)	CH4 (as Propane)	NMOC (as Propane)	NMOC Emission Rate			
Test ID	Date	Start	End	%	ppm	ppm	ppm	lbs/mmBTU	lbs/hr	g/hp-hr	
				Outlet	Outlet	Outlet	Outlet	Outlet	Outlet	Outlet	
1	2024-10-17	9:20	10:19	16.7	387.0	353.6	33.4	0.164	3.85	0.48	
2	2024-10-17	10:50	11:49	16.6	453.0	450.5	2.5	0.012	0.28	0.04	
3	2024-10-17	12:20	13:19	16.6	557.4	541.3	16.1	0.078	1.91	0.24	
		Average		16.6	505.2	495.9	9.3	0.045	1.09	0.14	**0.9 g/hp-hr**

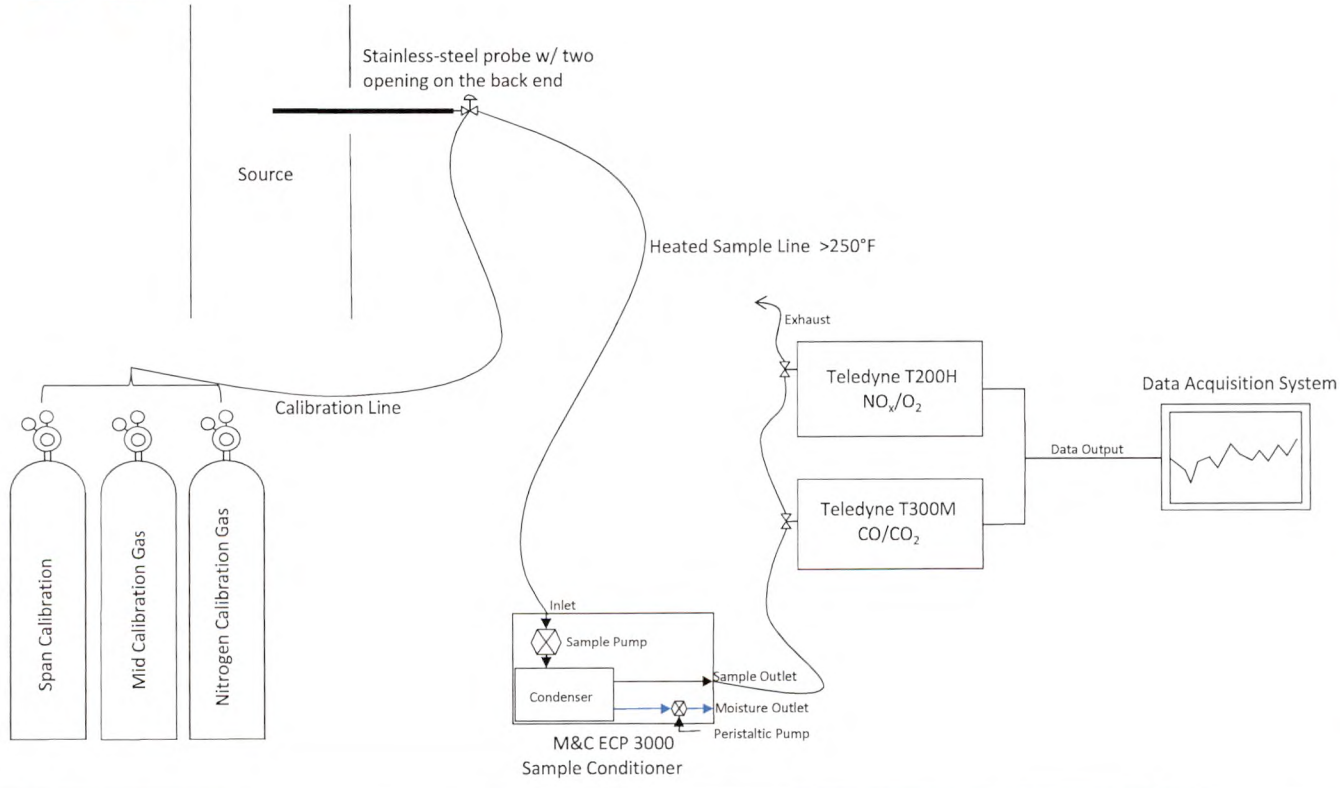
MMBTU = 1066.05 BTU/sft3 natural gas x ft3 of natural gas x 1 MMBTU/1,000,000 BTU

lb/MMBTU =NOx ppm x 0.0000001194 x 8710 x (20.9/20.9-Actual O2)

lb/MMBTU =THC (propane) ppm x 0.000000114 x 8710 x (20.9/20.9-Actual O2)

FIGURES

Figure No. 1: USEPA Method 3A,7E,10 Schematic



USEPA Method 3A,7E,10

DT Midstream

Washington 10

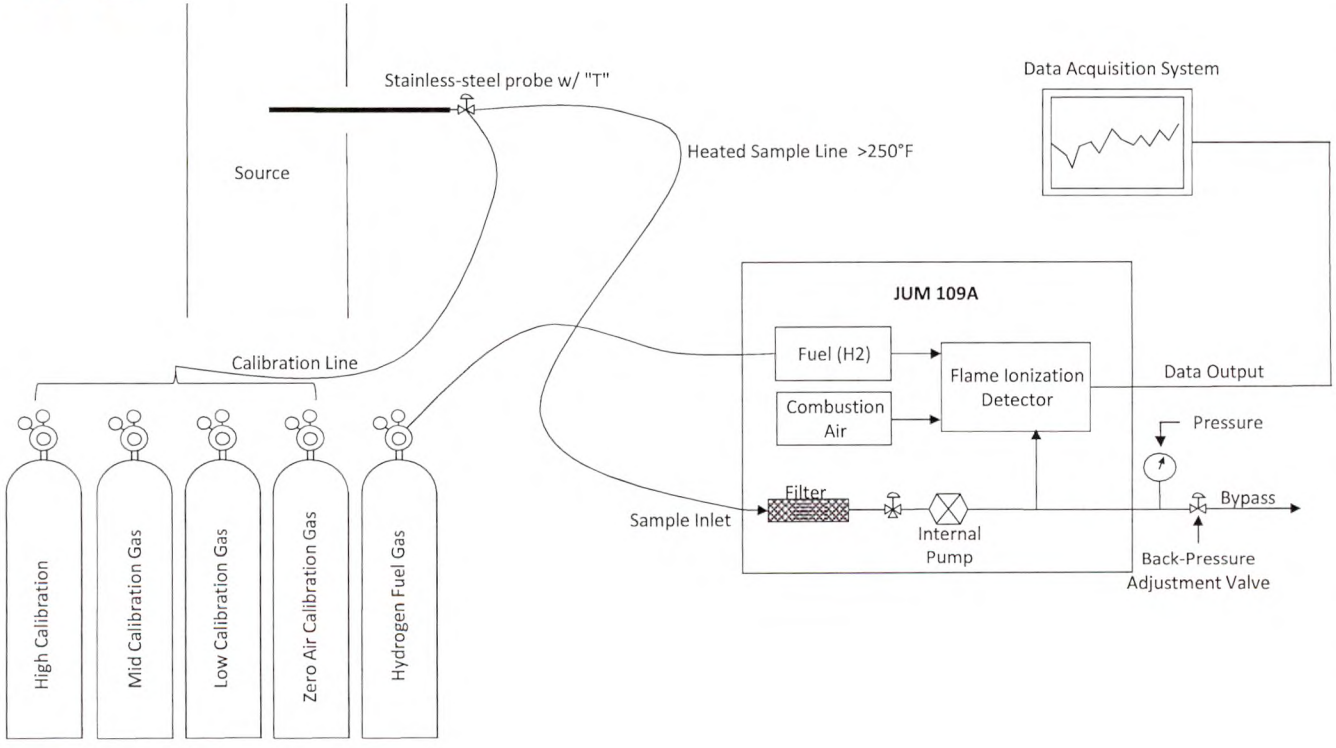
EUENGINE2 and EUENGINE4

Washington Township, Michigan

Project# 2403298

Date: October 17, 2024

Figure No. 2: USEPA Method 25A Schematic



USEPA Method 25A

DT Midstream

Washington 10

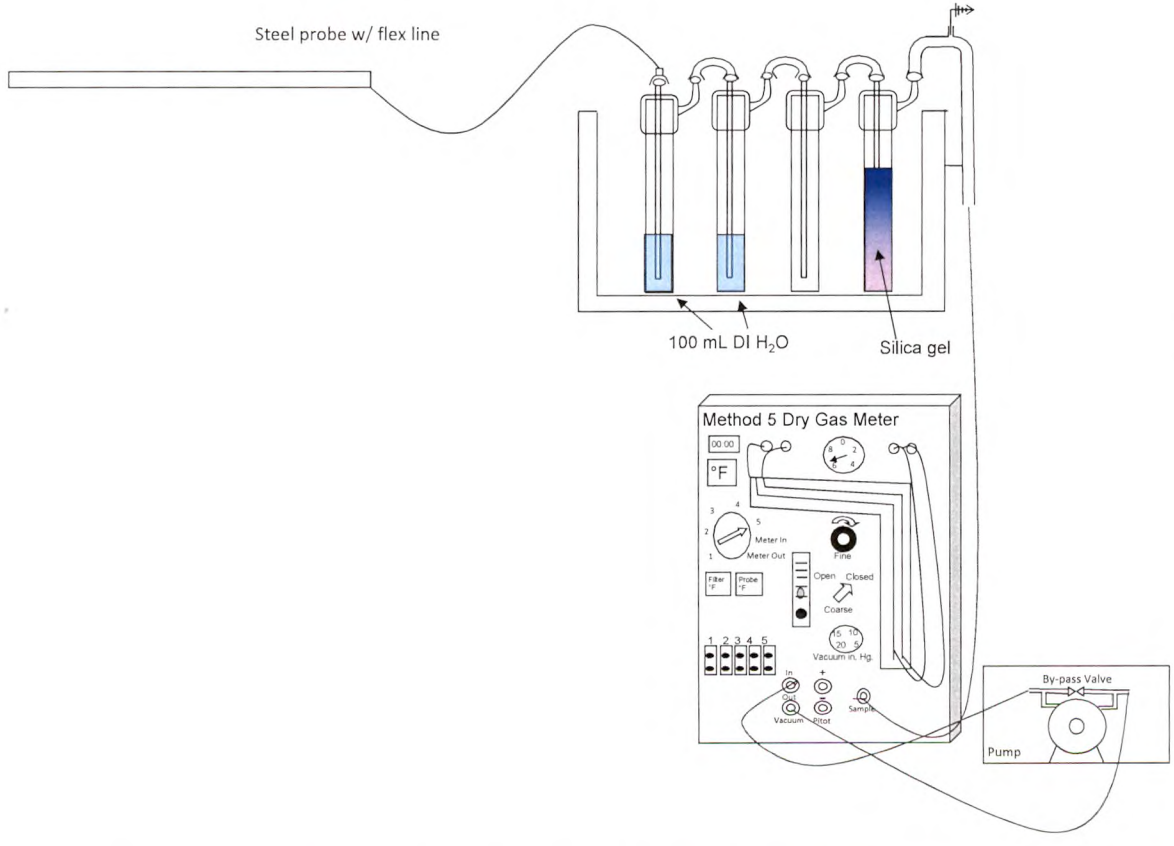
EUENGINE2

Washington Township, Michigan

Project# 2403298

Date: October 17, 2024

Figure No. 3: USEPA Method 4



USEPA Method 4

DT Midstream

Washington 10

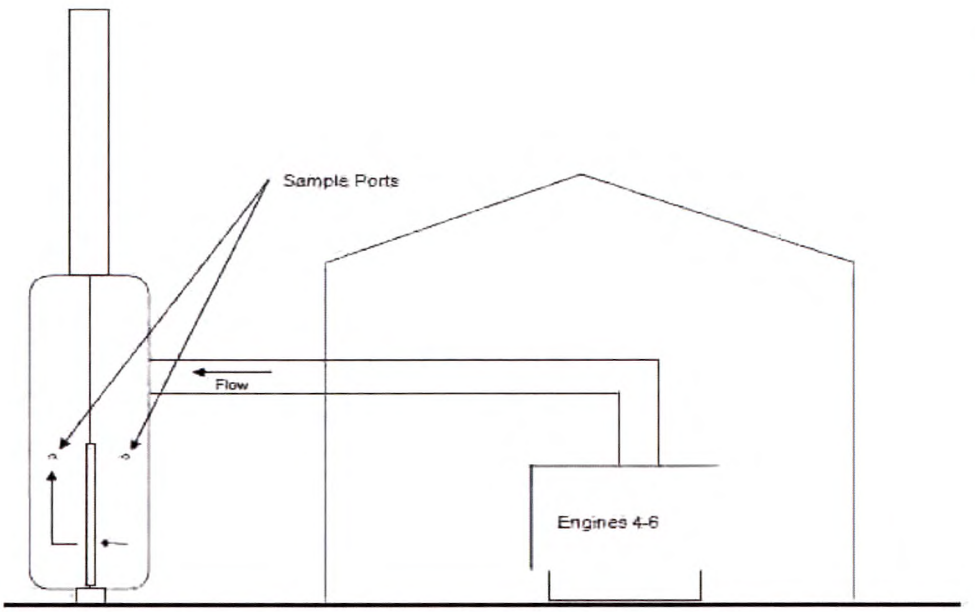
EUENGINE2

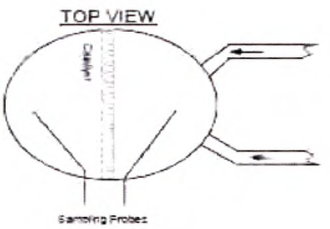
Washington Township, Michigan

Project# 2403298

Date: October 17, 2024

Figure No. 4: EUENGINE4 Stack Diagram





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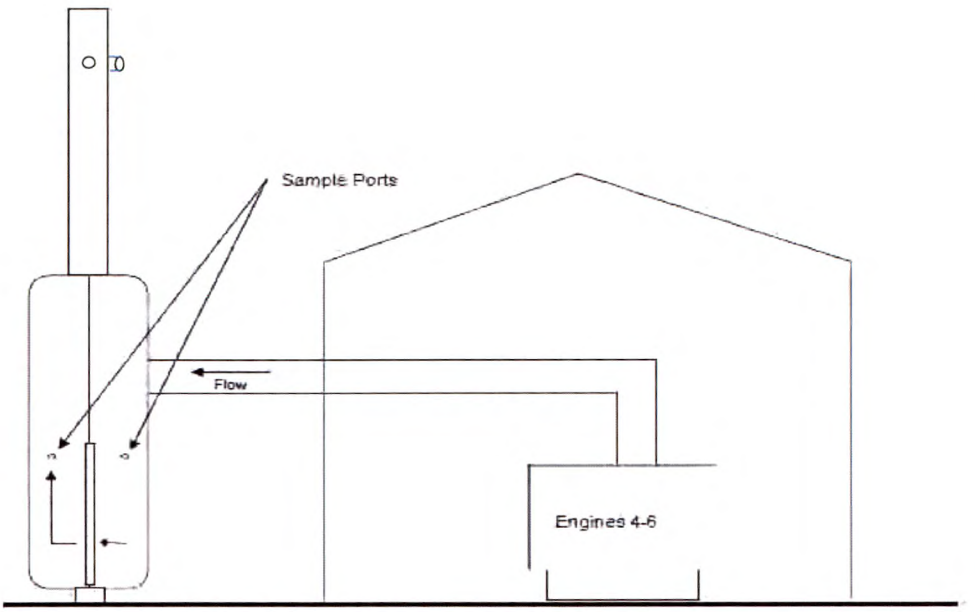
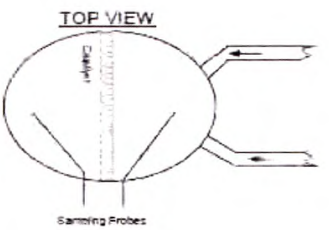
October 17, 2024

Figure No. 5: EUENGINE1-3 Stack Diagram





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