Particulate Matter (PM) CEMS

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PM CEMS

- Many Existing PM CEMS Represent "Monitoring by Extortion" - Consent Decree Requirements
- More Recently, PM CEMS Installed In Lieu of Opacity on New Wet Scrubbers
- A Few Have Accepted PM CEMS in Permits for New Units
- ◆ PM CEMS or CPMS an option in EGU MACT Rule February 16, 2012

Main Issues with PM CEMS

- Limited knowledge with respect to long-term stability or robustness of PM CEMS correlations – Particularly at Low Levels
 - PM CEMS do not actually measure mass
 - Sensitivity to stratification & size distribution
- Obtaining valid correlation on wet stacks or locations after a baghouse
- PM stratification
 - Can be an issue in certain situations
 - Testing is not well defined or straightforward

PM CEMS What Are Some of My Choices?

Measurement Techniques

- Beta Attenuation
- **♦** Light Scattering
- Hybrid with TEOM

M&C Particle Tracker

- Forward Light Scatter
- Dilution-Extractive
 - Typical DR = 8:1
- Can be used in a wet environment



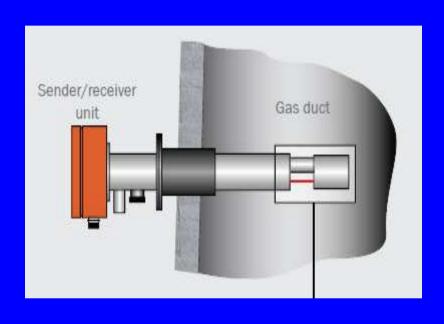
- Aersol Generator to conduct daily span checks
- Complete check of the sampling system
- Collects isokinectic sample (Input from stack flow monitor)

M&C Particle Tracker

- Participated in EPRI PM CEMS Study
 - Struggled with probe pluggage early in the program
 - Upgraded nozzle design & system blowback to help reduce probe pluggage
 - Improved performance at the end of project
- Tested versus a QAG
 - Showed a good linear response (R²> 0.95)

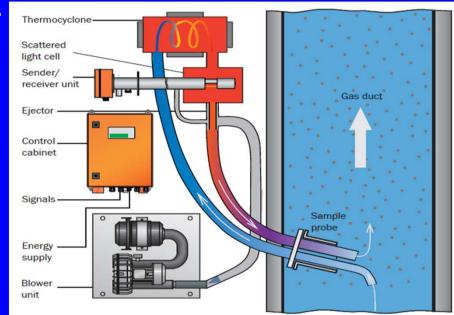
Sick Maihak FW-100

- Forward Light Scatter
- ♦ In-situ
- Dry stack applications only
- Has passed PS-11Correlation Testing
- Variable slopes for correlation curves on similar units
- Quarterly maintenance is requiring a 3-4 man-hours



Sick Maihak FWE-200

- Forward Light Scatter
- ♦ Straight-Extractive
- Dry or Wet stack applications
- Has passed PS-11Correlation Testing



- Uses "Thermocylone" to heat sample to prevent moisture interference with light-scatter measurement
- Widely used in the EGU Industry

PCME QAL-181

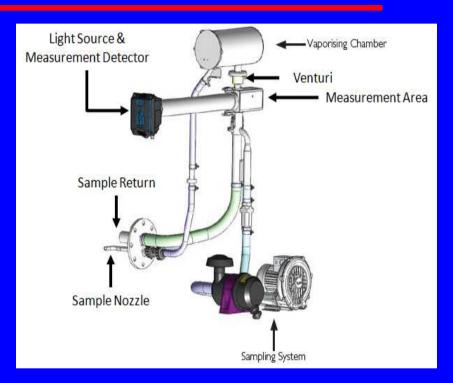
- Forward Light Scatter
- ♦ In-situ
- Dry stack applications only
- Limited US EGU Data



• For Span Checks, inserts reference scattering material to check detector measurement.

PCME 181-WS

- Forward Light Scatter
- Straight-Extractive
- Dry or Wet stack applications
- Has passed PS-11Correlation Testing



- Uses a vaporizing chamber to heat sample to prevent moisture interference with light-scatter measurement
- Can vary sample flow rate to maintain isokinectic sampling.

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MSI BetaGuard

- Beta-Attenuation
- Dilution-Extractive
- Dry or Wet stack applications
- ◆ Batch Samples 716-sec per cycle
- 4 PM readings per hour
- Sample umbilical up to 150 ft.
- Has passed PS-11 Correlation
- Must perform daily & quarterly sample volume audits

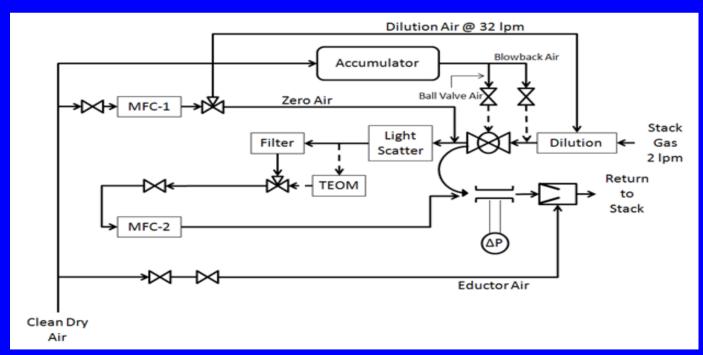


Thermo Hybrid PM CEMS

- Light-Scatter
 - Forward Primary Measurement Output
 - Back Used as a QA Check
 - » Shift in the Forward-to-Back scatter response ratio indication of change in PM physical characteristics
- TEOM Measurement
 - Used as a baseline for Forward Light-Scatter
 - TEOM measurement only acquired periodically
- Dilution-Extractive
 - Target Dilution Ratio of 16:1

Thermo Hybrid PM CEMS

- Can vary sample flow rate to maintain isokinectic sampling rate.
- Dry or Wet stack applications



Teledyne-ML LaserHawk

- Back Light Scatter
- ♦ In-situ
- Dry stack applications only
- Has been installed on a few US EGU sites
- Signal detector located in the optical head assembly
- Equipped with blower assembly to protect optics from corrosive stack gases



Altech Beta 5M

- Beta-Attenuation
- Straight-Extractive
- Dry or Wet stack applications
- Batch Samples
- PM readings every 8-minutes
- Maintains isokinectic sample rate
- Equipped to measure stack flow directly
- Must perform daily & quarterly sample volume audits



Alternative Correlation Procedures

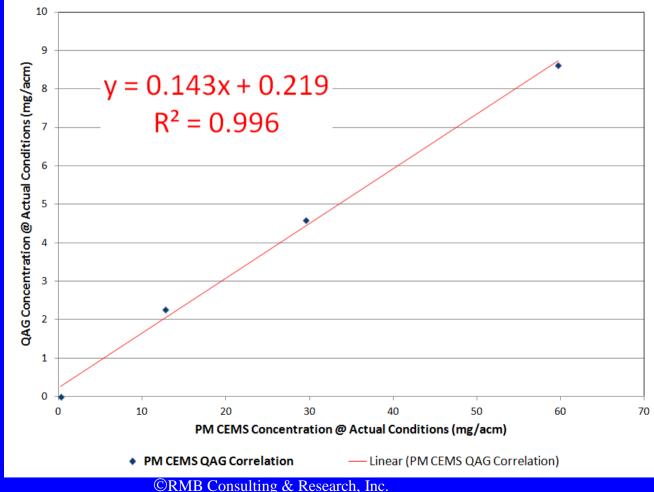
- ◆PS-11 Requirements
 - Vary PM loading (i.e., concentration) @ sample location
 - Difficult to vary PM loading on baghouse or wet scrubber units
 - Best correlations have data collected at or near the emission standard
 - Allows the use of zero or out-of-stack measurements
 - » Need multiple zero runs (i.e., ≥3) to give the points statistical weight in the correlation calculations

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- Ash Reinjection
 - Taking collected ash from the unit and injecting it back into the sample stream downstream of the last pollution control device
 - Has been attempted at several units
 - Does this represent normal operating conditions?
- Quantative Aersol Generator (QAG)
 - Provides NIST traceable PM concentrations
 - Does a QAG correlation yield comparable PS-11 correlations?

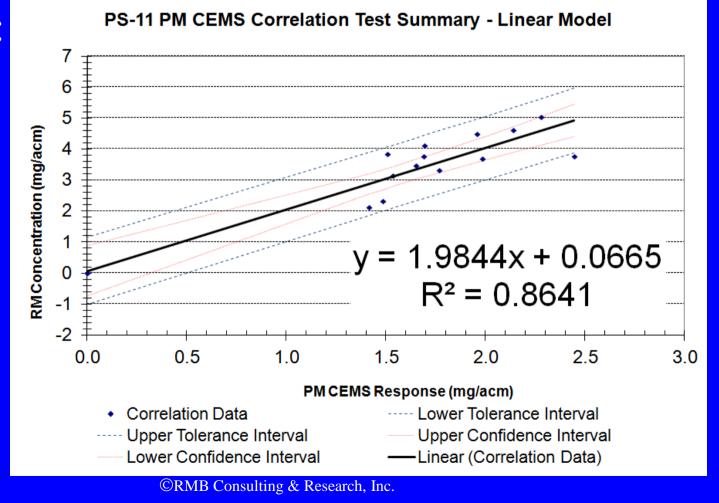
◆ Example QAG Correlation – Light-Scatter

Device:



◆ PS-11 Correlation for same Light-Scatter

Device:



QAG Correlation Applications

- How can a QAG correlation be applicable?
 - Used to demonstrate linear response of the detector over a wide range of PM Concentrations
 - » Performed by manufacturer
 - Apply site specific "Correction" factor to PM CEMS
 - » Similar to Part 75 flow rate monitors
 - Change PS-11 specifications from correlation to RATA.
 - » 20 % RA or ±25% of applicable emission standard