Order #26945537

RECEIVED
DEC 0 2 2014
Permits Services
SJVAPCD

PUBLIC NOTICE CHECK LIST

PROJECT #: N-767 PROJECT #: N-1131840

REQST.	COMPL.	
√	✓	ERC PRELIMINARY PUBLIC NOTICE
√	☒	Newspaper Notice Emailed to Clerical (Check box and tab to generate Notice)
√	—	Send email to "OA-PublicNotices" containing the following: SUBJECT: J R Simplot Company, N-767, N-1131840, prelim BODY: Emission Reduction Credit Banking for SOx emissions from the replacement of the catalysts in the converters serving the sulfuric acid plant

ENCLOSED DOCUMENTS REQUIRE:

√	✓	Enter Correct Date, Print All Documents from File and Obtain Director's Signature
√	✓	Determine date comment period will end, enter date on Newspaper Notice and Aviso en Español, and Email ***PRELIMINARY*** Newspaper Notice for Publication in Stockton Record Pub Date: 12/5/14 Due Date: 1-5-2015
√	✓	Mail/email ***PRELIMINARY*** Notice Letter to Applicant (email address: ✓ john.yanak@simplot.com) with the following attachments: √ Application Evaluation √ Newspaper Notice
√	✓	Email ***PRELIMINARY*** Public Notice package to EPA
√	✓	Email ***PRELIMINARY*** Public Notice package to CARB
√	✓	Email ***PRELIMINARY*** Newspaper Notice, Aviso en Español and Public Notice package to ~~"webmaster"~~ webteam
√	✓	After posted on website, send email with weblink of Newspaper notice, Aviso en Español, and full public notice package to: √ specific [C, S, or N] region **and** District wide permitting notification list-serves (both English and Spanish list serves) √ facility specific distribution list, (AQE – enter email address from PAS facility details notifications tab, if none enter NONE below): None
√	✓	Mail the newspaper notice and aviso en español (NN/AE), or full public notice package (FPNP) to the persons on facility specific distribution list, as follows (entered by AQE, if none, enter NONE below): ☐NN/AE or ☐FPNP Name/address:None ☐NN/AE or ☐FPNP Name/address:None
√	✓	Send ***PRELIMINARY*** Public Notice package to EDMS
—	—	Other Special Instructions (please specify):_____

Date Completed [DATE COMPLETED] /By Kai Chan

✓Tracker
✓Proof
✓Finance
✓Webteam
✓List Serve

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DAILY JOURNAL CORPORATION

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YOLANDA
SAN JOAQUIN VALLEY AIR POLL CONTROL DIST
1990 E. GETTYSBURG AVE.
FRESNO, CA 93726

COPY OF NOTICE

Notice Type: GPN GOVT PUBLIC NOTICE

Ad Description ERC PRELIMINARY PUBLIC NOTICE; JR SIMPLOT

To the right is a copy of the notice you sent to us for publication in the THE RECORD. Please read this notice carefully and call us with any corrections. The Proof of Publication will be filed with the County Clerk, if required, and mailed to you after the last date below. Publication date(s) for this notice is (are):

12/05/2014

CNS 2694537

NOTICE OF PRELIMINARY DECISION FOR THE PROPOSED ISSUANCE OF EMISSION REDUCTION CREDITS

NOTICE IS HEREBY GIVEN that the San Joaquin Valley Unified Air Pollution Control District solicits public comment on the proposed issuance of Emission Reduction Credits to J R Simplot Company for the replacement of the catalysts in the converters serving the sulfuric acid plant, at 16777 S. Howland Road in Lathrop, CA. The quantity of ERCs proposed for banking is 113,227 lb-SOx/year.
The analysis of the regulatory basis for this proposed action, Project #N-1131840, is available for public inspection at http://www.valleyair.org/notices/public_notices_idx.htm and at any District office. For additional information, please contact the District at (209) 557-6400. Written comments on this project must be submitted by January 5, 2015 to **ARNAUD MARJOLLET, DIRECTOR OF PERMIT SERVICES, SAN JOAQUIN VALLEY UNIFIED AIR POLLUTION CONTROL DISTRICT, 4800 ENTERPRISE WAY, MODESTO, CA 95356.**
12/5/14
CNS-2694537#
THE RECORD

A0000036139 89

Yolanda Alvarez

From:	Yolanda Alvarez
Sent:	Tuesday, December 02, 2014 11:38 AM
To:	Gerardo Rios EPA (SJV_T5_Permits@epa.gov); Mike Tollstrup (mtollstr@arb.ca.gov)
Cc:	'john.yanak@simplot.com'
Subject:	ERC Preliminary Public Notice for J R Simplot Company; Facility: N-767, Project# N-1131840
Attachments:	Preliminary N-1131840.pdf; Newspaper N-1131840.docx
Importance:	High

NOTICE IS HEREBY GIVEN that the San Joaquin Valley Unified Air Pollution Control District solicits public comment on the proposed issuance of Emission Reduction Credits to J R Simplot Company for the replacement of the catalysts in the converters serving the sulfuric acid plant, at 16777 S. Howland Road in Lathrop, CA. The quantity of ERCs proposed for banking is 113,227 lb-SOx/year.

★*Yolanda R. Alvarez*★
★OFFICE ASSISTANT II★
San Joaquin Valley APCD
1990 E. Gettysburg Ave
Fresno, CA 93726
yolanda.alvarez@valleyair.org
Service★Teamwork★Attitude★Respect

Yolanda Alvarez

From:	Microsoft Outlook
To:	'john.yanak@simplot.com'
Sent:	Tuesday, December 02, 2014 11:38 AM
Subject:	Relayed: ERC Preliminary Public Notice for J R Simplot Company; Facility: N-767, Project# N-1131840

Delivery to these recipients or groups is complete, but no delivery notification was sent by the destination server:

'john.yanak@simplot.com' (john.yanak@simplot.com) <mailto:john.yanak@simplot.com>

Subject: ERC Preliminary Public Notice for J R Simplot Company; Facility: N-767, Project# N-1131840

Aviso en Español for posting on Valleyair.org

AVISO DE DECISIÓN PRELIMINAR
PARA LA PROPUESTA OTORGACIÓN DE
CERTIFICADOS DE REDUCCIÓN DE EMISIONES

POR EL PRESENTE SE NOTIFICA que el Distrito Unificado para el Control de la Contaminación del Aire del Valle de San Joaquín está solicitando comentarios del público para la propuesta emisión de Certificados de Reducción de Emisiones (ERC, por sus siglas en inglés) a J R Simplot Company para el reemplazo de los catalizadores en los convertidores apoderando la planta de producción de ácido sulfúrico en 16777 S. Howland Road en Lathrop, CA. La cantidad de ERCs propuestas para almacenar es 113,227 lb-SOx/año.

El análisis de la base regulatoria para esta acción propuesta, Proyecto #N-1131840, está disponible para la inspección pública en http://www.valleyair.org/notices/public_notices_idx.htm y en cualquiera de las oficinas del Distrito. Para más información en Español, por favor comuníquese con el Distrito al (209) 557-6400. Comentarios por escrito acerca de este propuesto permiso inicial deben de ser sometidos antes del 5 de Enero del 2015 a **ARNAUD MARJOLLET, DIRECTOR DEL DEPARTAMENTO DE PERMISOS, SAN JOAQUIN VALLEY UNIFIED AIR POLLUTION CONTROL DISTRICT, 4800 ENTERPRISE WAY, MODESTO, CA 95356.**

NOTICE OF PRELIMINARY DECISION
FOR THE PROPOSED ISSUANCE OF
EMISSION REDUCTION CREDITS

NOTICE IS HEREBY GIVEN that the San Joaquin Valley Unified Air Pollution Control District solicits public comment on the proposed issuance of Emission Reduction Credits to J R Simplot Company for the replacement of the catalysts in the converters serving the sulfuric acid plant, at 16777 S. Howland Road in Lathrop, CA. The quantity of ERCs proposed for banking is 113,227 lb-SOx/year.

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Yolanda Alvarez

From: Microsoft Outlook
To: Gerardo Rios EPA (SJV_T5_Permits@epa.gov)
Sent: Tuesday, December 02, 2014 11:38 AM
Subject: Relayed: ERC Preliminary Public Notice for J R Simplot Company; Facility: N-767, Project# N-1131840

Delivery to these recipients or groups is complete, but no delivery notification was sent by the destination server:

Gerardo Rios EPA (SJV_T5_Permits@epa.gov) (SJV_T5_Permits@epa.gov) <mailto:SJV_T5_Permits@epa.gov>

Subject: ERC Preliminary Public Notice for J R Simplot Company; Facility: N-767, Project# N-1131840

Yolanda Alvarez

From:	Yolanda Alvarez
Sent:	Tuesday, December 02, 2014 11:42 AM
To:	WebTeam
Subject:	valleyair.org update: ERC Preliminary Public Notice for J R Simplot Company; Facility: N-767, Project# N-1131840
Attachments:	Preliminary N-1131840.pdf; Newspaper.pdf; Aviso.pdf

December 2, 2014 (Facility N-767 Project N-1131840) NOTICE IS HEREBY GIVEN that the San Joaquin Valley Unified Air Pollution Control District solicits public comment on the proposed issuance of Emission Reduction Credits to J R Simplot Company for the replacement of the catalysts in the converters serving the sulfuric acid plant, at 16777 S. Howland Road in Lathrop, CA. The quantity of ERCs proposed for banking is 113,227 lb-SOx/year. The comment period ends on January 5, 2015.

Newspaper Notice

Aviso

Public Notice Package

★*Yolanda R. Alvarez*★
★OFFICE ASSISTANT II★
San Joaquin Valley APCD
1990 E. Gettysburg Ave
Fresno, CA 93726
yolanda.alvarez@valleyair.org
Service★Teamwork★Attitude★Respect

Yolanda Alvarez

From: Yolanda Alvarez
Sent: Thursday, December 04, 2014 2:28 PM
To: All Region (Notices_of_Permitting_Actions-All_Regions@lists.valleyair.org); North (Notices_of_Permitting_Actions-Northern_Region@lists.valleyair.org)
Subject: Public Notice on Permitting Action N-1131840

The District has posted a new permitting public notice. The public notice can be viewed on our website at: http://www.valleyair.org/notices/Docs/2014/12-02-14_(N-1131840)/Newspaper.PDF

For a list of public notices and public notice packages, please visit our website at: http://www.valleyair.org/notices/public_notices_idx.htm#PermittingandEmissionReductionCreditCertificateNotices

Thank you.

★*Yolanda R. Alvarez*★
★OFFICE ASSISTANT II★
San Joaquin Valley APCD
1990 E. Gettysburg Ave
Fresno, CA 93726
yolanda.alvarez@valleyair.org
Service★Teamwork★Attitude★Respect

Yolanda Alvarez

From: Yolanda Alvarez
Sent: Thursday, December 04, 2014 2:29 PM
To: All Spanish (Avisos_Sobre_Acciones_de_Permisos-Todos@lists02.valleyair.org)
Subject: Aviso Publico Sobre Acciones de Permisos N-1131840

El Distrito del Aire a publicado un nuevo aviso público de permiso. El aviso público se puede ver en nuestro sitio de web en: http://www.valleyair.org/notices/Docs/2014/12-02-14_(N-1131840)/Aviso.PDF

Para obtener una lista de avisos públicos y paquetes de avisos públicos, por favor visite nuestro sitio de web en:
http://www.valleyair.org/notices/public_notices_idx.htm#PermittingandEmissionReductionCreditCertificateNotices

Gracias,

★Yolanda R. Alvarez★
★OFFICE ASSISTANT II★
San Joaquin Valley APCD
1990 E. Gettysburg Ave
Fresno, CA 93726
yolanda.alvarez@valleyair.org
Service★Teamwork★Attitude★Respect

San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT

HEALTHY AIR LIVING™

DEC 0 2 2014

John Yanak
J R Simplot Company
P.O. Box 198
Lathrop, CA 95330-0198

Re: Notice of Preliminary Decision – Emission Reduction Credits
Facility Number: N-767
Project Number: N-1131840

Dear Mr. Yanak:

Enclosed for your review and comment is the District's analysis of J R Simplot Company's application for Emission Reduction Credits (ERCs) resulting from the replacement of the catalysts in the converters serving the sulfuric acid plant, at 16777 S. Howland Road in Lathrop, CA. The quantity of ERCs proposed for banking is 113,227 lb-SOx/year.

The notice of preliminary decision for this project will be published approximately three days from the date of this letter. After addressing all comments made during the 30-day public notice comment period, the District intends to the issue the ERCs. Please submit your written comments on this project within the 30-day public comment period, as specified in the enclosed public notice.

Thank you for your cooperation in this matter. If you have any questions regarding this matter, please contact Mr. Kai Chan of Permit Services at (209) 557- 6451.

Sincerely,

Arnaud Marjollet
Director of Permit Services

AM:kc/ya

Enclosures

cc: Mike Tollstrup, CARB (w/enclosure) via email
cc: Gerardo C. Rios, EPA (w/enclosure) via email

Seyed Sadredin
Executive Director/Air Pollution Control Officer

Northern Region
4800 Enterprise Way
Modesto, CA 95356-8718
Tel: (209) 557-6400 FAX: (209) 557-6475

Central Region (Main Office)
1990 E. Gettysburg Avenue
Fresno, CA 93726-0244
Tel: (559) 230-6000 FAX: (559) 230-6061

Southern Region
34946 Flyover Court
Bakersfield, CA 93308-9725
Tel: 661-392-5500 FAX: 661-392-5585

www.valleyair.org www.healthyairliving.com

San Joaquin Valley Air Pollution Control District
ERC Banking Application Review

Facility Name:	J R Simplot Company	Date:	November 26, 2014
Mailing Address:	P.O. Box 198	Engineer:	Kai Chan
	Lathrop, CA 95330-0198	Lead Engineer:	Nick Peirce
Contact Person:	Brian Crets		
Telephone:	(209) 858-6429		
Email:	Brian.crets@simplot.com		
Facility ID:	N-767		
Project #:	N-1131840		
Date Received:	May 28, 2013		
Deemed Complete:	June 5, 2014		

I. PROPOSAL:

J R Simplot Company is applying to bank Emission Reduction Credits (ERCs) resulting from the replacement of the catalysts in the two converters (R-301 and R-201) serving the sulfuric acid production plant and where appropriate high efficiency catalysts were utilized to improve the overall SO_2-to-SO_3 conversion efficiency. The use of the new catalysts resulted in a decrease in SO_2 emissions due to the improved SO_2-to-SO_3 conversion. Authority to Construct (ATC) permit N-767-9-15 authorizing the replacement of the catalysts (under Project #N-1131773) was issued on September 3, 2013. The sulfuric acid production plant is currently operating with the new high efficiency catalysts and lower SO_2 emissions limit under District Permit to Operate (PTO) N-767-9-16, which is attached in Appendix C for reference.

The following table provides the summary of bankable emission reductions on a quarterly basis.

Bankable Emission Reductions (lb-SO_2/quarter)				
Pollutant	**1st Quarter**	**2nd Quarter**	**3rd Quarter**	**4th Quarter**
SOx (as SO_2)	20,450	37,084	33,600	22,137

II. APPLICABLE RULES:

District Rule 2201: New and Modified Stationary Source Review (04/21/11)
District Rule 2301: Emission Reduction Credit Banking (01/19/12)

III. LOCATION OF REDUCTIONS:

The facility is located at 16777 Howland Road in Lathrop, California.

IV. METHOD OF GENERATING REDUCTIONS:

JR Simplot Company operates a sulfuric acid plant that manufactures sulfuric acid via a double-contact and double absorption process. To produce sulfuric acid; molten elemental sulfur is burned in a furnace to produce an SO_2 rich gas stream. After being passed through a heat recovery boiler to remove heat from the gas stream, the SO_2 is passed through a two-pass four-bed catalytic converter (R-301) where it reacts with oxygen to form SO_3. After the first converter, the now SO_3 rich gas stream is cooled and sent to an intermediate absorbing tower where much of the SO_3 is absorbed into a concentrated sulfuric acid solution. The exhaust gas from the intermediate absorbing tower is reheated and routed to a second multi-pass four-bed catalytic converter (R-201) where most of the remaining SO_2 is converted to SO_3. The gas stream exists the second converter, is cooled by heat recovery boilers, and is then routed to the final absorbing tower where virtually all of the remaining gas-phase SO_3 is absorbed into a concentrated sulfuric acid solution. The produced sulfuric acid is pumped into storage tanks.

The operation will emit SO_2 from the manufacturing process and is controlled with the existing mist eliminators on the absorption towers. The applicant did not make any changes to the existing control equipment. However, the applicant is proposing to use high efficiency catalysts in the existing converters, which will reduce SO_2 emissions by converting a higher quantity of SO_2 into SO_3 during the sulfuric acid manufacturing process.

V. EMISSIONS CALCULATIONS:

A. Assumptions:

1. SOx (as SO_2), sulfuric acid mist, PM_{10} (sulfuric acid mist emissions with an aerodynamic diameter less than 10 microns), and NOx will be emitted by the sulfuric acid manufacturing process. However, SO_2 emission reductions will only be generated due to the use of the high efficiency catalysts in the existing converters due to the improved SO_2-to-SO_3 conversion process.

2. Other assumptions will be stated as they are made.

B. Emission Factors (EF):

1. Pre-Modification SO_2 Emission Factors (EF1):

   The sulfuric acid production plant exhaust stack is equipped with continuous emissions monitors (CEMS) to measure SO_2 emissions. CEMS data is considered to be the best data available to estimate the emissions per District Policy APR-1110 (4/29/04). This data will be used to estimate the actual emissions for the purpose of this project.

2. Post-Modification SO_2 Emission Factors (EF2):

   The post-modification SO_2 emission factor is based on the applicant's proposed SOx emission limits and emission rates as indicated in the table below. These emission limits were verified by a source test conducted on Dec. 5, 2013.

Post-Modification Emission Factors for Permit N-767-9-16	
Pollutant	**EF2 and PE2**
$SOx_{Acid\ Plant}$ (EF2)	2.5 lb-SO_2/ton of 100% sulfuric acid produced[(1)]
$SOx_{Acid\ Plant}$ (Daily PE2)	1,750 lb-SO_2/day
$SOx_{Acid\ Plant}$ (Annual PE2)	410,296 lb-SO_2/year

C. Baseline Period:

Section 3.8 of District Rule 2201 defines the baseline period as a period of time equal to either the two consecutive years of operation immediately prior to the submission date of the complete application; or at least two consecutive years within the five years immediately prior to the submission of the complete application if it is more representative of normal source operations.

The Authority to Construct (ATC) permit application authorizing the use of the high efficiency catalysts, as processed under District Project #N-1131773, was received on May 28, 2013. ERC's are issued on a quarterly basis and the District will consider only full calendar quarters in the Baseline Period analysis. For this project the previous full calendar quarter is the first quarter of 2013. Therefore, the two consecutive years immediately prior to the submission date of the complete application is from April 1, 2011 to March 31, 2013 and will be the baseline period for this project.

D. Historical Actual Emissions:

Historical Actual Emissions (HAEs) are emissions that actually occurred, and are calculated from actual production records and established emission factors per Rule 2201, Section 6.2.1.

During CEMS data review, it is ensured that none of the readings is in excess of the permitted limits, and if there is any, it is corrected to the permitted limit. SO_2 emissions are summarized in the following table. The raw and corrected CEMS data is provided in Appendix B of this document.

HAE					
Year	**Q1 (lb-SO_2/qtr)**	**Q2 (lb-SO_2/qtr)**	**Q3 (lb-SO_2/qtr)**	**Q4 (lb-SO_2/qtr)**	**Total Annual (lb-SO_2/year)**
2011	---	186,593	156,788	95,956	---
2012	105,135	164,475	161,290	113,609	---
2013	88,459	---	---	---	---
Average	**96,797**	**175,534**	**159,039**	**104,783**	**536,153**

[1] Based on a proposed SOx emission rate of 1,750.0 lb/day and producing 700 tons/day of sulfuric acid, EF2 is equal to 2.5 lb-SO2/ton.

E. Actual Emissions Reductions (AERs):

Per Rule 2201, Section 4.12:

AER = HAE – Post Project Potential to Emit (PE2)

J R Simplot Company is not a seasonal source as defined in District Rule 2201, Section 3.37. The quarterly PE2 will be calculated based on the percentage of the annual actual emissions ($HAE_{Total\ Annual}$) occurring in each quarter during the baseline period calculated as follows:

Quarterly Operating Percentage = ($HAE_{Quarterly\ Emissions}$ ÷ $HAE_{Total\ Annual\ Emissions}$) × 100%
= ($HAE_{Quarterly\ Emissions}$ ÷ 536,153 lb-SO_2/year) × 100%

Quarterly PE2 (lb-SO_2/quarter) = Annual PE2 (lb-SO_2/year)
× Quarterly Operating Percentage
= 410,296 lb-SO_2/year
× Quarterly Operating Percentage

Quarter	HAE (lb-SO_2/quarter)	Quarterly Operating Percentage (%)	PE2 (lb-SO_2/quarter)
1	96,797	18.0540	74,075
2	175,534	32.7395	134,329
3	159,039	29.6630	121,706
4	104,783	19.5435	80,186

AER (lb-SO_2/quarter) = HAE (lb-SO_2/quarter) – PE2 (lb-SO_2/quarter)

AER			
Quarter	HAE (lb-SO_2/quarter)	PE2 (lb-SO_2/quarter)	AER (lb-SO_2/quarter)
1	96,797	74,075	22,722
2	175,534	134,329	41,205
3	159,039	121,706	37,333
4	104,783	80,186	24,597

F. Air Quality Improvement Reduction:

The air quality improvement deduction, per Rule 2201, Section 4.12.1, is 10% of the AERs. Therefore, the Air Quality Improvement Deduction will be calculated utilizing the following formula:

Air Quality Improvement Deduction = AER × 0.10

Air Quality Improvement Deduction		
Quarter	AER (lb-SO_2/quarter)	10% Deduction (lb-SO_2/quarter)
1	22,722	2,272
2	41,205	4,121
3	37,333	3,733
4	24,597	2,460

G. Increases in Permitted Emissions:

There is no increase in permitted emissions due to this project.

H. Bankable Emission Reductions:

The bankable ERCs presented below are determined by subtraction of the Air Quality Improvement Deductions from the AERs. Therefore:

Bankable Emission Reductions = AER – Air Quality Improvement Deductions

Bankable Emission Reductions			
Quarter	AER (lb-SO_2/quarter)	Air Quality Improvement Deductions (lb-SO_2/quarter)	Bankable Emission Reductions (lb-SO_2/quarter)
1	22,722	2,272	20,450
2	41,205	4,121	37,084
3	37,333	3,733	33,600
4	24,597	2,460	22,137

VI. COMPLIANCE:

To comply with the definition of Actual Emission Reductions (Rule 2201, Section 3.2.1 and Rule 2301, Sections 3.6 and 4.2.1), the reductions must be:

A. Real:

The emission reductions were generated by the replacement of the catalysts in the converters serving the sulfuric acid production plant with high efficiency catalysts, which resulted in a decrease in SO_2 emissions due to the improved SO_2-to-SO_3 conversion. If the replacement of the catalysts had not been done the emission reductions could not have otherwise occurred as authorized under ATC permit N-767-9-15. On December 5, 2013 a source test was conducted at the facility on the exhaust stack of the sulfuric acid plant. The results of the source test indicated a maximum SOx emission rate of 0.9 lb-SO_2/ton of sulfuric acid produced and 351 lb-SO_2/day, which verified compliance with the current SOx emission limits of 2.5 lb-SO_2/ton of sulfuric acid produced and 1,750 lb-

SO_2/day, respectively. In addition, recent review of their quarterly CEMs data from the sulfuric acid plant also verified compliance with these SOx emission limits. The District is satisfied that emissions in the amounts calculated did indeed occur. Therefore, the emission reductions are real.

B. Enforceable:

The reductions are enforceable since ATC permit N-767-9-15 to implement the replacement of the catalysts has been converted into PTO N-767-9-16. The resulting lower SOx emissions limit of 2.5 lb-SO_2/ton of sulfuric acid produced at a sulfuric acid production rate limit of 700 tons/day are required by the conditions on the PTO and compliance with this limit was verified by a source test conducted at the sulfuric acid plant on December 5, 2013. Continued compliance with these limits will be verified by the required annual source testing and CEM system. In addition, the SOx emission limits are performance based limitations in pounds per ton of sulfuric acid produced, pounds of emissions per day, and pounds of emissions per year. The Permit to Operate and subsequent Permits to Operate for this sulfuric acid plant will maintain the performance based limitations for SOx. The conditions will include language stating that this condition is to enforce emission reductions of this project. This addition will ensure enforceability of the emission reduction credits for all future actions pertaining to this Permit to Operate (PTO N-767-9-16 is attached in Appendix C). Therefore, the reductions are enforceable.

C. Quantifiable:

The reductions were calculated utilizing the facilities historic CEMs data and methodologies consistent with District Rule 2201. Therefore the reductions are quantifiable.

D. Permanent:

The equipment description of the PTO lists the required emission control equipment, SOx emission limits are present on the permit, annual source testing and a CEM system is required to verify compliance with the SOx emission limits. Therefore, the reductions are permanent.

E. Surplus:

The applicant is proposing ERC's for SOx emissions from a sulfuric acid production plant. To determine whether or not reductions are surplus, the District must examine its current and proposed rules as well as requirements projected to apply to operations for which ERC's are proposed. The District also considers other District's rules during a surplus emission analysis. After examining all current, pending and projected regulations, the District will discount the emission factors to the level of the most stringent rule. And finally, discounting for any baseline period emission limit violations will also be performed. During this analysis, rules from the following agencies will be considered:

United States Environmental Protection Agency (USEPA)
California Air Resources Board (CARB)
San Joaquin Valley Air Pollution Control District (SJVAPCD)

South Coast Air Quality Management District (SCAQMD)
Bay Area Air Quality Management District (BAAQMD)
Sacramento Metropolitan Air Quality Management District (SMAQMD)

Below are the rules that will be considered:

Agency	Sulfur Compound Rules
USEPA	40 CFR Part 60, Subpart H
CARB	No Applicable Rules
SJVAPCD	4801
SCAQMD	469
BAAQMD	Regulation 9, Rule 1
SMAQMD	406, Section 301

Sulfur Compound Rules:

40 CFR Part 60, Subpart H – Standards of Performance for Sulfuric Acid Plants

§60.82(a) of this rule limits sulfur dioxide (SO_2) emissions to not exceed 4 lb/ton (2 kg/metric ton) expressed as 100 percent H_2SO_4. The historical actual emissions used in this project were based on facility CEMS data that complies with the permitted limit of 4 lb/ton. Therefore, the proposed bankable emission reductions are surplus of this USEPA Regulation.

SJVAPCD Rule 4801 – Sulfur Compounds

Section 3.1 of this rule states that a person shall not discharge into the atmosphere sulfur compounds, which would exist as a liquid or gas at standard conditions, exceeding in concentration at the point of discharge: 0.2 % by volume (or 2,000 ppmv) calculated as SO_2, on a dry basis averaged over 15 consecutive minutes.

The HAE was calculated based on actual emissions with a sulfuric acid production plant potential to emit limit of 2,461 lb-SOx/day, 102.5 lb-SOx/hour, or 1.71 lb-SOx/min (based on operating 24 hr/day or 1,440 min/day). Therefore, the volume of SO_2 can be calculated using the following formula based on the ideal gas equation with an exhaust flow rate of 21,602 dscf/min:

$$\frac{1.71\ \text{lb}-\text{SOx}}{\text{Min}} \times \frac{\text{Min}}{21{,}602\ \text{dscf}} \times \frac{\text{lb}\cdot\text{mol}}{64\ \text{lb}} \times \frac{379.5\cdot\text{ft}^3}{\text{lb}\cdot\text{mol}} \times \frac{1{,}000{,}000\cdot\text{parts}}{\text{million}} = 469.4\ \frac{\text{parts}}{\text{million}}$$

SO_2 Concentration = 469.4 ppmv < 2,000 ppmv (or 0.2%)

Therefore, the proposed bankable emission reduction credits are surplus of District Rule 4801 requirements.

SCAQMD Rule 469 – Sulfuric Acid Units

Section (a) of this rule states that a person shall not discharge into the atmosphere form any sulfuric acid unit, effluent process gas containing more than: (1) 500 ppm of sulfur compounds expressed as SO_2, calculated on a dry basis averaged over a minimum of 15 consecutive minutes.; (2) 90 kilograms (198.5 pounds) per hour of sulfur compounds expressed as SO_2.

As determined above, HAE was calculated based on a maximum SO_2 concentration of 469.5 ppmv and a maximum emission rate of 102.5 lb/hour, which is less than these rule requirements. Therefore, the proposed bankable emission reduction credits are surplus of SCAQMD Rule 469 requirements.

BAAQMD Regulation 9 - Inorganic Gaseous Pollutions, Rule 1 - Sulfur Dioxide

Section 9-1-309 of this rule states that a person shall not emit, from any source in a sulfuric acid plant, effluent process gas containing sulfur dioxide in excess of 300 ppm by volume calculated at 12% oxygen. To determine if the HAE exceeds this regulation, this requirement will be converted to a lb/hr value using the maximum exhaust flow rate for the sulfuric acid plant of 21,602 dscf/min and the following equation:

$$\frac{300\,\text{ppmv}}{10^6} \times \frac{64\,\text{lb}}{\text{lb mol}} \times \frac{\text{lb} \cdot \text{mol}}{379.5\,\text{ft}^3} \times \frac{21{,}602\,\text{dscf}}{\text{min}} \times \frac{60\,\text{min}}{\text{hour}} \times \frac{20.95}{(20.95 - 12.0)} = 153.5 \frac{\text{lb} - SO_2}{\text{hour}}$$

As determined above, the HAE was calculated based on a maximum SO_2 emission rate of 102.5 lb/hour, which is less than this rule requirement. Therefore, the proposed bankable emission reduction credits are surplus of BAAQMD Regulation 9, Rule 1 requirements.

SMAQMD Rule 406 - Specific Contaminants, Section 300 – Standards

Section 301 of this rules states that a person shall not discharge into the atmosphere from any single source of emission whatsoever sulfur compounds in any state or combination thereof exceeding in concentration at the point of discharge: sulfur compounds, calculated as sulfur dioxide (SO_2): 0.2% by volume (2,000 ppmv) except as otherwise provided in Rule 420.

As determined above, the HAE was calculated based on a maximum SO_2 concentration of 469.5 ppmv, which is less than this rule requirement. Therefore, the proposed bankable emission reduction credits are surplus of SMAQMD Rule 406, Section 300 requirements.

F. Not used for the approval of an Authority to Construct or as Offsets:

The ERCs generated by the replacement of the catalysts in the two converters (R-301 and R-201) serving the sulfuric acid production plant were not used for the approval of any Authority to Construct or as offsets.

G. Timely Submittal:

Section 5.5 of Rule 2301 states that ERC certificate applications for reductions shall be submitted within 180 days after modification and startup (date of permanent emission reductions) of the emissions unit. The modification and equipment startup occurred on October 14, 2013, and the ERC application was received on May 28, 2013. Therefore, the application was submitted in a timely fashion since the application was received prior to 180 days of the modified equipment startup date.

VII. RECOMMENDATION:

The District recommends that an ERC Certificate be issued to J R Simplot Company for the amount indicated in the following table.

Bankable Emission Reductions in lb/quarter				
Pollutant	**1st Quarter**	**2nd Quarter**	**3rd Quarter**	**4th Quarter**
SOx (as SO_2)	20,445	37,085	33,560	22,137

APPENDICES:

Appendix A Draft ERC Certificate
Appendix B Copy of the Raw and Corrected CEM Data for HAE Calculations
Appendix C Permit to Operate N-767-9-16

Appendix A

Draft ERC Certificate

San Joaquin Valley
Air Pollution Control District

Northern Regional Office • 4800 Enterprise Way • Modesto, CA 95356-8718

Emission Reduction Credit Certificate

N-1250-5

DRAFT

ISSUED TO: J R SIMPLOT COMPANY

ISSUED DATE: <DRAFT>

LOCATION OF REDUCTION: 16777 S. HOWLAND ROAD
LATHROP, CA 95330

For SOx Reduction In The Amount Of:

Quarter 1	Quarter 2	Quarter 3	Quarter 4
20,450 lbs	37,084 lbs	33,600 lbs	22,137 lbs

[ ] Conditions Attached

Method Of Reduction

[ ] Shutdown of Entire Stationary Source
[ ] Shutdown of Emissions Units
[X] Other

Replacement of catalyst in the sulfuric acid plant converters (under ATC permit unit N-767-9-15) that will result in improved SO2 to SO3 conversion and reduction in SO2 emissions.

Use of these credits outside the San Joaquin Valley Unified Air Pollution Control District (SJVUAPCD) is not allowed without express written authorization by the SJVUAPCD.

Seyed Sadredin, Executive Director / APCO

DRAFT

Arnaud Marjollet, Director of Permit Services

Nov 26 2014 8:01AM – CHANK

Appendix B

Copy of the Raw and Corrected CEM Data for HAE Calculations

[redacted]

Monthly Summaries

Date	Adjusted SO2 Emissions (lbs)	100% H2SO4 Production (tons)	24-M Avg SO2 (T/yr)	H2SO4 EF (lb/T)	H2SO4 Emissions (T)	24-M Avg H2SO4 (T/yr)	24-M Avg Production (T/yr)
Apr-2011	49,671	16,448	262	0.093	0.76	8.35	175,733
May-2011	69,004	56,392 20,342	264	0.093	0.95	8.35	176,717
Jun-2011	67,918	19,602	271	0.093	0.91	8.44	179,574
Jul-2011	64,293	20,190	280	0.093	0.94	8.51	181,894
Aug-2011	50,454	48,742 15,595	277	0.093	0.73	8.39	180,479
Sep-2011	42,041	12,957	277	0.093	0.60	8.39	181,208
Oct-2011	7,616	4,371	273	0.093	0.20	8.30	179,534
Nov-2011	48,418	35,618 17,340	274	0.093	0.81	8.31	180,790
Dec-2011	39,922	13,907	274	0.093	0.65	8.30	181,305
Jan-2012	33,895	11,340	275	0.154	0.87	8.49	181,382
Feb-2012	30,292	35,287 10,331	272	0.154	0.80	8.59	179,977
Mar-2012	40,948	13,616	269	0.154	1.05	8.75	178,696
Apr-2012	50,762	16,830	271	0.154	1.30	9.10	180,509
May-2012	60,233	52,666 19,323	272	0.154	1.49	9.46	181,647
Jun-2012	53,480	16,513	273	0.154	1.27	9.71	181,293
Jul-2012	69,946	20,429	279	0.154	1.57	10.13	183,324
Aug-2012	51,850	47,679 15,473	283	0.154	1.19	10.41	184,207
Sep-2012	39,494	11,777	278	0.154	0.91	10.46	180,990
Oct-2012	22,579	7,890	280	0.154	0.61	10.66	182,681
Nov-2012	56,587	36,536 16,212	287	0.154	1.25	11.02	184,922
Dec-2012	34,443	12,434	281	0.154	0.96	11.06	181,445
Jan-2013	28,353	10,428	277	0.154	0.80	11.07	178,266
Feb-2013	29,606	36,943 12,574	274	0.154	0.97	11.19	176,709
Mar-2013	30,500	13,941	268	0.154	1.07	11.32	174,932

106,593 | 156,788 | 95,956 | 105,138 | 164,475 | 161,290 | 113,609 | 88,459

Adjusted Daily Values

Date	Raw 15-min SO2 Avg	Adj. 15-min SO2 Avg	Raw 3-hr SO2 Avg	Adj. 3-hr SO2 Avg	Raw ppmv SO2 Avg	Adj. ppmv SO2 Avg	Raw Daily Rate (SO2 lb/day)	Adj. Daily Rate (SO2 lb/day)	Final Daily Rate (SO2 lb/day)
04/01/2011	3.04	3.04	3.04	3.04	272	272	1,377	1,377	1,377
04/02/2011	3.03	3.03	3.03	3.03	274	274	1,404	1,404	1,404
04/03/2011	3.10	3.10	3.09	3.09	284	284	1,443	1,443	1,443
04/04/2011	3.19	3.19	3.18	3.18	294	294	1,466	1,466	1,466
04/05/2011	2.98	3.01	2.98	2.98	274	274	1,511	1,511	1,511
04/06/2011	3.05	3.05	3.06	3.06	279	279	1,469	1,469	1,469
04/07/2011	2.95	2.95	2.95	2.95	266	266	1,457	1,457	1,457
04/08/2011	3.00	3.00	2.99	2.99	273	273	1,467	1,467	1,467
04/09/2011	2.96	2.96	2.97	2.97	266	266	1,557	1,557	1,557
04/10/2011	2.94	2.94	2.93	2.93	264	264	1,610	1,610	1,610
04/11/2011	3.11	3.11	3.09	3.09	284	284	1,663	1,663	1,663
04/12/2011	3.10	3.10	3.10	3.10	282	282	1,842	1,842	1,842
04/13/2011	3.04	3.04	3.04	3.04	274	274	1,861	1,861	1,861
04/14/2011	3.03	3.03	3.02	3.02	273	273	1,824	1,824	1,824
04/15/2011	3.11	3.11	3.11	3.11	283	283	1,817	1,817	1,817
04/16/2011	3.26	3.26	3.01	3.01	280	280	1,868	1,868	1,868
04/17/2011	3.25	3.25	3.25	3.25	296	296	1,265	1,265	1,265
04/18/2011	3.12	3.12	3.14	3.14	279	279	1,985	1,985	1,985
04/19/2011	3.41	3.41	3.41	3.41	313	313	1,419	1,419	1,419
04/20/2011	3.23	3.23	3.23	3.23	293	293	2,061	2,061	2,061
04/21/2011	3.13	3.13	3.11	3.11	279	279	1,956	1,956	1,956
04/22/2011	3.28	3.28	3.28	3.28	297	297	1,905	1,905	1,905
04/23/2011	3.29	3.29	3.29	3.29	298	298	2,024	2,024	2,024
04/24/2011	3.27	3.27	3.26	3.26	295	295	2,027	2,027	2,027
04/25/2011	3.29	3.29	3.28	3.28	298	298	1,988	1,988	1,988
04/26/2011	3.35	3.35	3.35	3.35	307	307	1,994	1,994	1,994
04/27/2011	3.30	3.30	3.30	3.30	301	301	2,031	2,031	2,031
04/28/2011	12.92	6.35	14.24	3.63	236	236	1,842	1,842	470
04/29/2011	3.38	3.38	3.37	3.37	310	310	862	862	862
04/30/2011	3.40	3.40	3.41	3.41	312	312	2,047	2,047	2,047
05/01/2011	3.27	3.27	3.26	3.26	299	299	2,081	2,081	2,081
05/02/2011	3.34	3.34	3.33	3.33	307	307	2,022	2,022	2,022
05/03/2011	3.32	3.33	3.32	3.31	292	293	2,129	2,129	2,124
05/04/2011	3.30	3.30	3.30	3.30	303	303	2,039	2,039	2,039
05/05/2011	3.25	3.25	3.27	3.27	296	296	2,121	2,121	2,121
05/06/2011	3.24	3.24	3.23	3.23	292	292	2,090	2,090	2,090
05/07/2011	3.37	3.37	3.37	3.37	307	307	2,093	2,093	2,093
05/08/2011	3.35	3.35	3.34	3.34	305	305	2,172	2,172	2,172
05/09/2011	3.36	3.36	3.35	3.35	305	305	2,155	2,155	2,155
05/10/2011	3.33	3.33	3.33	3.33	302	302	2,159	2,159	2,159
05/11/2011	3.38	3.38	3.38	3.38	308	308	2,139	2,139	2,139
05/12/2011	3.37	3.37	3.36	3.36	306	306	2,167	2,167	2,167
05/13/2011	3.39	3.39	3.38	3.38	309	309	2,224	2,224	2,224
05/14/2011	3.40	3.40	3.40	3.40	309	309	2,278	2,278	2,278
05/15/2011	3.43	3.43	3.43	3.43	310	310	2,288	2,288	2,288
05/16/2011	3.45	3.45	3.44	3.44	313	313	2,295	2,295	2,295
05/17/2011	3.51	3.51	3.51	3.51	320	320	2,312	2,312	2,312
05/18/2011	3.50	3.50	3.51	3.51	321	321	2,361	2,361	2,361
05/19/2011	3.43	3.43	3.43	3.43	313	313	2,348	2,348	2,348
05/20/2011	3.40	3.40	3.40	3.40	310	310	2,295	2,295	2,295
05/21/2011	3.40	3.40	3.40	3.40	309	309	2,272	2,272	2,272
05/22/2011	3.41	3.41	3.40	3.40	309	309	2,275	2,275	2,275
05/23/2011	3.45	3.45	3.44	3.44	313	313	2,277	2,277	2,277
05/24/2011	3.37	3.37	3.37	3.37	303	303	2,302	2,302	2,302
05/25/2011	3.41	3.41	3.40	3.40	308	308	2,266	2,266	2,266
05/26/2011	3.39	3.39	3.39	3.39	307	307	2,296	2,296	2,296
05/27/2011	3.43	3.43	3.43	3.43	313	313	2,278	2,278	2,278
05/28/2011	3.43	3.43	3.42	3.42	312	312	2,309	2,309	2,309
05/29/2011	3.46	3.46	3.46	3.46	315	315	2,311	2,311	2,311
05/30/2011	3.44	3.44	3.43	3.43	312	312	2,339	2,339	2,339
05/31/2011	3.41	3.41	3.41	3.41	308	308	2,314	2,314	2,314
06/01/2011	3.33	3.33	3.33	3.33	298	298	2,296	2,296	2,296

Adjusted Daily Values

Date	Raw 15-min SO2 Avg	Adj. 15-min SO2 Avg	Raw 3-hr SO2 Avg	Adj. 3-hr SO2 Avg	Raw ppmv SO2 Avg	Adj. ppmv SO2 Avg	Raw Daily Rate (SO2 lb/day)	Adj. Daily Rate (SO2 lb/day)	Final Daily Rate (SO2 lb/day)
06/02/2011	4.56	4.56	3.89	3.50	355	355	2,237	2,237	2,013
06/03/2011	3.36	3.36	3.35	3.35	307	307	1,366	1,366	1,366
06/04/2011	3.46	3.46	3.45	3.45	316	316	2,249	2,249	2,249
06/05/2011	3.35	3.35	3.35	3.35	303	303	2,342	2,342	2,342
06/06/2011	3.43	3.43	3.43	3.43	313	313	2,259	2,259	2,259
06/07/2011	3.22	3.27	3.30	3.30	301	301	2,311	2,311	2,311
06/08/2011	3.39	3.39	3.39	3.39	310	310	2,229	2,229	2,229
06/09/2011	3.42	3.42	3.43	3.43	312	312	2,289	2,289	2,289
06/10/2011	3.26	3.26	3.24	3.24	296	296	2,278	2,278	2,278
06/11/2011	3.47	3.47	3.46	3.46	317	317	2,124	2,124	2,124
06/12/2011	3.51	3.51	3.51	3.51	321	321	2,351	2,351	2,351
06/13/2011	3.45	3.45	3.45	3.45	314	314	2,372	2,372	2,372
06/14/2011	3.45	3.45	3.45	3.45	314	314	2,335	2,335	2,335
06/15/2011	3.37	3.37	3.37	3.37	306	306	2,338	2,338	2,338
06/16/2011	3.32	3.32	3.32	3.32	299	299	2,284	2,284	2,284
06/17/2011	3.36	3.36	3.35	3.35	303	303	2,267	2,267	2,267
06/18/2011	3.39	3.39	3.39	3.39	305	305	2,299	2,299	2,299
06/19/2011	3.37	3.37	3.37	3.37	304	304	2,307	2,307	2,307
06/20/2011	3.40	3.40	3.39	3.39	307	307	2,297	2,297	2,297
06/21/2011	3.43	3.43	3.44	3.44	311	311	2,307	2,307	2,307
06/22/2011	3.41	3.41	3.40	3.40	308	308	2,330	2,330	2,330
06/23/2011	3.42	3.42	3.42	3.42	308	308	2,316	2,316	2,316
06/24/2011	3.41	3.41	3.40	3.40	306	306	2,334	2,334	2,334
06/25/2011	3.43	3.43	3.42	3.42	308	308	2,324	2,324	2,324
06/26/2011	3.44	3.44	3.43	3.43	310	310	2,336	2,336	2,336
06/27/2011	3.44	3.44	3.44	3.44	310	310	2,338	2,338	2,338
06/28/2011	3.47	3.47	3.47	3.47	312	312	2,343	2,343	2,343
06/29/2011	3.41	3.41	3.40	3.40	305	305	2,360	2,360	2,360
06/30/2011	3.43	3.43	3.45	3.45	311	311	2,324	2,324	2,324
07/01/2011	3.35	3.35	3.35	3.35	305	305	2,341	2,341	2,341
07/02/2011	3.44	3.44	3.44	3.44	315	315	2,285	2,285	2,285
07/03/2011	3.38	3.38	3.38	3.38	307	307	2,345	2,345	2,345
07/04/2011	3.42	3.42	3.42	3.42	312	312	2,285	2,285	2,285
07/05/2011	3.37	3.37	3.36	3.36	308	308	2,325	2,325	2,325
07/06/2011	3.34	3.34	3.34	3.34	304	304	2,293	2,293	2,293
07/07/2011	3.40	3.40	3.40	3.40	310	310	2,269	2,269	2,269
07/08/2011	3.36	3.36	3.36	3.36	305	305	2,320	2,320	2,320
07/09/2011	3.35	3.35	3.35	3.35	303	303	2,276	2,276	2,276
07/10/2011	3.31	3.31	3.31	3.31	298	298	2,282	2,282	2,282
07/11/2011	3.40	3.40	3.39	3.39	302	302	2,253	2,253	2,253
07/12/2011	3.38	3.38	3.38	3.38	306	306	2,294	2,294	2,294
07/13/2011	3.42	3.42	3.42	3.42	309	309	2,317	2,317	2,317
07/14/2011	3.37	3.37	3.37	3.37	303	303	2,344	2,344	2,344
07/15/2011	3.38	3.38	3.38	3.38	306	306	2,304	2,304	2,304
07/16/2011	3.41	3.41	3.41	3.41	309	309	2,321	2,321	2,321
07/17/2011	3.38	3.38	3.38	3.38	307	307	2,333	2,333	2,333
07/18/2011	3.36	3.36	3.36	3.36	304	304	2,309	2,309	2,309
07/19/2011	3.32	3.32	3.32	3.32	301	301	2,289	2,289	2,289
07/20/2011	3.33	3.33	3.33	3.33	303	303	2,256	2,256	2,256
07/21/2011	3.32	3.32	3.32	3.32	305	305	2,262	2,262	2,262
07/22/2011	3.36	3.36	3.35	3.35	311	311	2,276	2,276	2,276
07/23/2011	74.35	5.77	72.23	3.38	541	456	0	0	0
07/24/2011	2.81	2.81	2.80	2.80	254	254	1,037	1,037	1,037
07/25/2011	2.77	2.77	2.77	2.77	251	251	1,847	1,847	1,847
07/26/2011	2.84	2.84	2.84	2.84	259	259	1,824	1,824	1,824
07/27/2011	2.79	2.79	2.79	2.79	254	254	1,902	1,902	1,902
07/28/2011	2.71	2.71	2.72	2.72	246	246	1,887	1,887	1,887
07/29/2011	2.58	2.58	2.58	2.58	233	233	1,835	1,835	1,835
07/30/2011	2.41	2.41	2.41	2.41	218	218	1,743	1,743	1,743
07/31/2011	2.21	2.21	2.23	2.23	202	202	1,634	1,634	1,634
08/01/2011	1.81	1.81	1.84	1.84	165	165	1,512	1,512	1,512
08/02/2011	2.59	2.62	2.48	2.48	241	241	1,233	1,233	1,233

Adjusted Daily Values

Date	Raw 15-min SO2 Avg	Adj. 15-min SO2 Avg	Raw 3-hr SO2 Avg	Adj. 3-hr SO2 Avg	Raw ppmv SO2 Avg	Adj. ppmv SO2 Avg	Raw Daily Rate (SO2 lb/day)	Adj. Daily Rate (SO2 lb/day)	Final Daily Rate (SO2 lb/day)
08/03/2011	3.45	3.45	3.45	3.45	309	309	1,819	1,819	1,819
08/04/2011	3.30	3.30	3.30	3.30	297	297	2,334	2,334	2,334
08/05/2011	3.45	3.45	3.46	3.46	311	311	2,253	2,253	2,253
08/06/2011	3.45	3.45	3.45	3.45	311	311	2,342	2,342	2,342
08/07/2011	3.42	3.42	3.42	3.42	307	307	2,349	2,349	2,349
08/08/2011	3.45	3.45	3.45	3.45	310	310	2,324	2,324	2,324
08/09/2011	3.58	3.58	3.39	3.34	314	314	2,334	2,334	2,297
08/10/2011	3.31	3.31	3.30	3.30	302	302	1,423	1,423	1,423
08/11/2011	3.29	3.29	3.29	3.29	299	299	2,160	2,160	2,160
08/12/2011	3.31	3.31	3.30	3.30	301	301	2,183	2,183	2,183
08/13/2011	3.21	3.21	3.22	3.22	291	291	2,191	2,191	2,191
08/14/2011	2.98	2.98	2.98	2.98	270	270	2,048	2,048	2,048
08/15/2011	2.95	2.95	2.95	2.95	267	267	1,409	1,409	1,409
08/16/2011	2.98	2.98	2.97	2.97	272	272	1,364	1,364	1,364
08/17/2011	3.08	3.08	3.09	3.09	284	284	1,383	1,383	1,383
08/18/2011	3.08	3.08	3.07	3.07	283	283	1,445	1,445	1,445
08/19/2011	3.02	3.02	3.01	3.01	276	276	1,373	1,373	1,373
08/20/2011	3.11	3.11	3.11	3.11	286	286	1,152	1,152	1,152
08/21/2011	3.07	3.07	3.08	3.08	280	280	1,179	1,179	1,179
08/22/2011	3.08	3.08	3.06	3.06	281	281	1,162	1,162	1,162
08/23/2011	3.14	3.14	3.15	3.15	288	288	1,157	1,157	1,157
08/24/2011	2.97	2.97	2.97	2.97	268	268	1,177	1,177	1,177
08/25/2011	3.04	3.04	3.03	3.03	280	280	1,171	1,171	1,171
08/26/2011	2.91	2.91	2.92	2.92	264	264	1,319	1,319	1,319
08/27/2011	2.91	2.91	2.90	2.90	263	263	1,280	1,280	1,280
08/28/2011	2.99	2.99	2.98	2.98	273	273	1,291	1,291	1,291
08/29/2011	2.97	2.97	2.98	2.98	271	271	1,341	1,341	1,341
08/30/2011	3.01	3.01	3.01	3.01	278	278	1,349	1,349	1,349
08/31/2011	2.98	2.98	2.98	2.98	272	272	1,437	1,437	1,437
09/01/2011	3.00	3.00	2.99	2.99	275	275	1,415	1,415	1,415
09/02/2011	3.00	3.00	3.00	3.00	277	277	1,420	1,420	1,420
09/03/2011	2.90	2.90	2.90	2.90	263	263	1,420	1,420	1,420
09/04/2011	2.88	2.88	2.88	2.88	261	261	1,317	1,317	1,317
09/05/2011	2.96	2.96	2.95	2.95	271	271	1,331	1,331	1,331
09/06/2011	2.88	2.88	2.96	2.95	256	256	1,380	1,380	1,375
09/07/2011	2.97	2.97	2.97	2.97	272	272	1,292	1,292	1,292
09/08/2011	3.01	3.01	3.00	3.00	274	274	1,496	1,496	1,496
09/09/2011	3.06	3.06	3.05	3.05	279	279	1,694	1,694	1,694
09/10/2011	3.10	3.10	3.10	3.10	281	281	1,755	1,755	1,755
09/11/2011	3.13	3.13	3.13	3.13	282	282	1,871	1,871	1,871
09/12/2011	3.16	3.16	3.15	3.15	285	285	1,915	1,915	1,915
09/13/2011	3.18	3.18	3.17	3.17	288	288	1,924	1,924	1,924
09/14/2011	3.10	3.10	3.10	3.10	281	281	1,936	1,936	1,936
09/15/2011	3.08	3.08	3.07	3.07	274	274	1,896	1,896	1,896
09/16/2011	3.24	3.24	3.23	3.23	291	291	1,950	1,950	1,950
09/17/2011	3.41	3.41	3.40	3.40	310	310	2,146	2,146	2,146
09/18/2011	3.40	3.40	3.40	3.40	309	309	2,317	2,317	2,317
09/19/2011	3.45	3.45	3.44	3.44	315	315	2,298	2,298	2,298
09/20/2011	3.41	3.41	3.40	3.40	311	311	2,336	2,336	2,336
09/21/2011	3.47	3.47	3.46	3.46	316	316	2,305	2,305	2,305
09/22/2011	3.41	3.41	3.41	3.41	310	310	2,341	2,341	2,341
09/23/2011	3.40	3.40	3.42	3.42	307	307	2,290	2,290	2,290
09/24/2011	0.00	0.00	0.00	0.00	0	0	0	0	0
09/25/2011	0.00	0.00	0.00	0.00	0	0	0	0	0
09/26/2011	0.00	0.00	0.00	0.00	0	0	0	0	0
09/27/2011	0.00	0.00	0.00	0.00	0	0	0	0	0
09/28/2011	0.00	0.00	0.00	0.00	0	0	0	0	0
09/29/2011	0.00	0.00	0.00	0.00	0	0	0	0	0
09/30/2011	0.00	0.00	0.00	0.00	0	0	0	0	0
10/01/2011	0.00	0.00	0.00	0.00	0	0	0	0	0
10/02/2011	0.00	0.00	0.00	0.00	0	0	0	0	0
10/03/2011	0.00	0.00	0.00	0.00	0	0	0	0	0

Adjusted Daily Values

Date	Raw 15-min SO2 Avg	Adj. 15-min SO2 Avg	Raw 3-hr SO2 Avg	Adj. 3-hr SO2 Avg	Raw ppmv SO2 Avg	Adj. ppmv SO2 Avg	Raw Daily Rate (SO2 lb/day)	Adj. Daily Rate (SO2 lb/day)	Final Daily Rate (SO2 lb/day)
10/04/2011	0.00	0.00	0.00	0.00	0	0	0	0	0
10/05/2011	0.00	0.00	0.00	0.00	0	0	0	0	0
10/06/2011	0.00	0.00	0.00	0.00	0	0	0	0	0
10/07/2011	0.00	0.00	0.00	0.00	0	0	0	0	0
10/08/2011	0.00	0.00	0.00	0.00	0	0	0	0	0
10/09/2011	0.00	0.00	0.00	0.00	0	0	0	0	0
10/10/2011	0.00	0.00	0.00	0.00	0	0	0	0	0
10/11/2011	0.00	0.00	0.00	0.00	0	0	0	0	0
10/12/2011	0.00	0.00	0.00	0.00	0	0	0	0	0
10/13/2011	0.00	0.00	0.00	0.00	0	0	0	0	0
10/14/2011	0.00	0.00	0.00	0.00	0	0	0	0	0
10/15/2011	0.00	0.00	0.00	0.00	0	0	0	0	0
10/16/2011	0.00	0.00	0.00	0.00	0	0	0	0	0
10/17/2011	0.00	0.00	0.00	0.00	0	0	0	0	0
10/18/2011	0.00	0.00	0.00	0.00	0	0	0	0	0
10/19/2011	0.00	0.00	0.00	0.00	0	0	0	0	0
10/20/2011	0.00	0.00	0.00	0.00	0	0	0	0	0
10/21/2011	0.00	0.00	0.00	0.00	0	0	0	0	0
10/22/2011	2.18	2.18	2.25	2.25	190	190	0	0	0
10/23/2011	5.78	3.28	5.82	2.27	171	171	563	563	220
10/24/2011	1.86	1.86	1.85	1.85	168	168	798	798	798
10/25/2011	1.87	1.87	1.88	1.88	169	168	868	868	868
10/26/2011	1.78	1.78	1.78	1.78	161	161	871	871	871
10/27/2011	1.62	1.62	1.64	1.64	146	146	869	869	869
10/28/2011	2.24	2.24	2.18	2.18	204	204	894	894	894
10/29/2011	5.33	3.08	5.32	2.65	235	235	1,454	1,454	724
10/30/2011	2.42	2.42	2.42	2.42	216	216	1,416	1,416	1,416
10/31/2011	4.52	3.28	2.42	2.42	214	214	1,318	1,318	955
11/01/2011	4.60	3.30	3.68	2.80	254	254	997	997	715
11/02/2011	2.44	2.44	2.45	2.45	219	219	1,464	1,464	1,464
11/03/2011	3.93	3.81	3.90	2.86	224	224	1,257	1,257	922
11/04/2011	2.74	2.74	2.74	2.74	254	254	1,273	1,273	1,273
11/05/2011	2.77	2.77	2.77	2.77	256	256	1,617	1,617	1,617
11/06/2011	2.78	2.78	2.78	2.78	258	258	1,642	1,642	1,642
11/07/2011	2.80	2.80	2.80	2.80	260	260	1,715	1,715	1,715
11/08/2011	2.75	2.75	2.76	2.76	254	254	1,684	1,684	1,684
11/09/2011	2.70	2.70	2.70	2.70	249	249	1,679	1,679	1,679
11/10/2011	2.70	2.70	2.70	2.70	248	248	1,582	1,582	1,582
11/11/2011	2.81	2.81	2.80	2.80	260	260	1,662	1,662	1,662
11/12/2011	2.92	2.92	2.92	2.92	273	273	1,806	1,806	1,806
11/13/2011	2.88	2.88	2.88	2.88	267	267	1,944	1,944	1,944
11/14/2011	2.78	2.78	2.78	2.78	256	256	1,940	1,940	1,940
11/15/2011	3.38	3.38	3.38	2.89	225	225	1,766	1,766	1,508
11/16/2011	2.67	2.67	2.66	2.66	245	245	1,408	1,408	1,408
11/17/2011	2.69	2.69	2.70	2.70	246	246	1,651	1,651	1,651
11/18/2011	2.69	2.69	2.68	2.68	244	244	1,686	1,686	1,686
11/19/2011	2.77	2.77	2.76	2.76	253	253	1,709	1,709	1,709
11/20/2011	2.85	2.85	2.84	2.84	261	261	1,794	1,794	1,794
11/21/2011	2.89	2.89	2.89	2.89	266	266	1,807	1,807	1,807
11/22/2011	2.82	2.82	2.82	2.82	261	261	1,820	1,820	1,820
11/23/2011	2.84	2.84	2.84	2.84	263	263	1,692	1,692	1,692
11/24/2011	2.75	2.75	2.74	2.74	251	251	1,693	1,693	1,693
11/25/2011	2.81	2.81	2.81	2.81	258	258	1,630	1,630	1,630
11/26/2011	2.79	2.79	2.79	2.79	256	256	1,688	1,688	1,688
11/27/2011	2.79	2.79	2.78	2.78	255	255	1,681	1,681	1,681
11/28/2011	2.77	2.77	2.76	2.76	252	252	1,674	1,674	1,674
11/29/2011	2.77	2.77	2.76	2.76	251	251	1,661	1,661	1,661
11/30/2011	2.83	2.83	2.83	2.83	260	260	1,672	1,672	1,672
12/01/2011	2.75	2.75	2.74	2.74	251	251	1,715	1,715	1,715
12/02/2011	2.81	2.81	2.80	2.80	258	258	1,671	1,671	1,671
12/03/2011	2.73	2.73	2.73	2.73	248	248	1,690	1,690	1,690
12/04/2011	2.84	2.84	2.84	2.84	262	262	1,623	1,623	1,623

Adjusted Daily Values

Date	Raw 15-min SO2 Avg	Adj. 15-min SO2 Avg	Raw 3-hr SO2 Avg	Adj. 3-hr SO2 Avg	Raw ppmv SO2 Avg	Adj. ppmv SO2 Avg	Raw Daily Rate (SO2 lb/day)	Adj. Daily Rate (SO2 lb/day)	Final Daily Rate (SO2 lb/day)
12/05/2011	2.77	2.77	2.77	2.77	255	255	1,686	1,686	1,686
12/06/2011	2.65	2.65	2.69	2.69	243	243	1,536	1,536	1,536
12/07/2011	2.80	2.80	2.80	2.80	262	262	1,252	1,252	1,252
12/08/2011	2.88	2.88	2.87	2.87	271	271	1,224	1,224	1,224
12/09/2011	2.88	2.88	2.88	2.88	269	269	1,259	1,259	1,259
12/10/2011	3.01	3.01	2.99	2.99	285	285	1,256	1,256	1,256
12/11/2011	3.00	3.00	3.00	3.00	284	284	1,307	1,307	1,307
12/12/2011	2.92	2.92	2.92	2.92	272	272	1,296	1,296	1,296
12/13/2011	2.90	2.90	2.89	2.89	270	270	1,235	1,235	1,235
12/14/2011	2.84	2.84	2.85	2.85	263	263	1,235	1,235	1,235
12/15/2011	2.82	2.82	2.82	2.82	260	260	1,214	1,214	1,214
12/16/2011	2.89	2.89	2.88	2.88	267	267	1,192	1,192	1,192
12/17/2011	2.80	2.80	2.80	2.80	255	255	1,231	1,231	1,231
12/18/2011	2.78	2.78	2.78	2.78	253	253	1,199	1,199	1,199
12/19/2011	2.83	2.83	2.82	2.82	260	260	1,187	1,187	1,187
12/20/2011	2.80	2.80	2.80	2.80	257	257	1,205	1,205	1,205
12/21/2011	2.87	2.87	2.86	2.86	262	262	1,167	1,167	1,167
12/22/2011	2.75	2.75	2.77	2.77	250	250	1,192	1,192	1,192
12/23/2011	2.76	2.76	2.75	2.75	250	250	1,142	1,142	1,142
12/24/2011	2.76	2.76	2.76	2.76	249	249	1,138	1,138	1,138
12/25/2011	2.77	2.77	2.76	2.76	251	251	1,145	1,145	1,145
12/26/2011	2.81	2.81	2.80	2.80	256	256	1,142	1,142	1,142
12/27/2011	2.86	2.86	2.86	2.86	263	263	1,164	1,164	1,164
12/28/2011	2.83	2.83	2.83	2.83	261	261	1,184	1,184	1,184
12/29/2011	2.85	2.85	2.85	2.85	262	262	1,173	1,173	1,173
12/30/2011	3.05	3.05	3.03	3.03	285	285	1,117	1,117	1,117
12/31/2011	3.01	3.01	3.01	3.01	279	279	1,145	1,145	1,145
01/01/2012	3.06	3.06	3.05	3.05	286	286	1,129	1,129	1,129
01/02/2012	3.12	3.12	3.11	3.11	293	293	1,127	1,127	1,127
01/03/2012	3.44	3.42	3.37	3.35	298	298	1,146	1,146	1,139
01/04/2012	3.14	3.14	3.15	3.15	295	295	1,154	1,154	1,154
01/05/2012	3.01	3.01	3.01	3.01	281	281	1,133	1,133	1,133
01/06/2012	3.06	3.06	3.05	3.05	285	285	1,099	1,099	1,099
01/07/2012	3.08	3.08	3.08	3.08	289	289	1,119	1,119	1,119
01/08/2012	3.01	3.01	3.00	3.00	281	281	1,132	1,132	1,132
01/09/2012	2.92	2.92	2.93	2.93	269	269	1,103	1,103	1,103
01/10/2012	2.84	2.84	2.84	2.84	259	259	1,072	1,071	1,072
01/11/2012	2.75	2.75	2.74	2.74	249	249	1,038	1,038	1,038
01/12/2012	2.95	2.95	2.96	2.96	272	272	1,000	1,000	1,000
01/13/2012	2.96	2.96	2.95	2.95	274	274	1,069	1,069	1,069
01/14/2012	2.77	2.77	2.77	2.77	250	250	1,070	1,070	1,070
01/15/2012	2.88	2.88	2.87	2.87	264	264	1,004	1,004	1,004
01/16/2012	2.82	2.82	2.83	2.83	257	257	1,044	1,044	1,044
01/17/2012	2.64	2.64	2.64	2.64	236	236	1,008	1,008	1,008
01/18/2012	2.57	2.57	2.57	2.57	229	229	944	944	944
01/19/2012	2.71	2.71	2.69	2.69	246	246	935	935	935
01/20/2012	3.05	3.05	3.04	3.04	282	282	987	987	987
01/21/2012	2.45	2.45	2.53	2.53	227	227	1,073	1,073	1,073
01/22/2012	3.34	3.34	3.30	3.30	298	298	882	882	882
01/23/2012	2.82	2.82	2.81	2.81	258	258	1,161	1,161	1,161
01/24/2012	2.94	2.94	2.92	2.92	265	265	1,177	1,177	1,177
01/25/2012	3.18	3.18	3.17	3.17	291	291	1,272	1,272	1,272
01/26/2012	3.22	3.22	3.21	3.21	296	296	1,169	1,169	1,169
01/27/2012	3.17	3.17	3.17	3.17	285	285	1,179	1,179	1,179
01/28/2012	3.32	3.32	3.31	3.31	305	305	1,114	1,114	1,114
01/29/2012	3.35	3.35	3.35	3.35	310	310	1,167	1,167	1,167
01/30/2012	3.42	3.42	3.41	3.41	317	317	1,184	1,184	1,184
01/31/2012	3.27	3.27	3.27	3.27	299	299	1,212	1,212	1,212
02/01/2012	3.32	3.32	3.31	3.31	306	306	1,160	1,160	1,160
02/02/2012	3.31	3.31	3.30	3.30	304	304	1,174	1,174	1,174
02/03/2012	3.39	3.39	3.39	3.39	315	315	1,174	1,174	1,174
02/04/2012	3.37	3.37	3.37	3.37	311	311	1,205	1,205	1,205

Adjusted Daily Values

Date	Raw 15-min SO2 Avg	Adj. 15-min SO2 Avg	Raw 3-hr SO2 Avg	Adj. 3-hr SO2 Avg	Raw ppmv SO2 Avg	Adj. ppmv SO2 Avg	Raw Daily Rate (SO2 lb/day)	Adj. Daily Rate (SO2 lb/day)	Final Daily Rate (SO2 lb/day)
02/05/2012	3.36	3.36	3.36	3.36	309	309	1,185	1,185	1,185
02/06/2012	3.05	3.98	0.99	3.06	339	330	1,182	1,182	1,153
02/07/2012	3.04	3.13	3.07	3.07	288	288	1,127	1,127	1,127
02/08/2012	2.76	2.76	2.76	2.76	250	250	1,197	1,197	1,197
02/09/2012	2.78	2.78	2.78	2.78	254	254	1,051	1,051	1,051
02/10/2012	2.70	2.70	2.69	2.69	246	246	1,056	1,056	1,056
02/11/2012	2.70	2.70	2.70	2.70	246	246	1,024	1,024	1,024
02/12/2012	2.64	2.64	2.64	2.64	240	240	1,026	1,026	1,026
02/13/2012	2.61	2.61	2.61	2.61	236	236	1,000	1,000	1,000
02/14/2012	2.62	2.62	2.61	2.61	237	237	993	993	993
02/15/2012	2.43	2.43	2.45	2.45	217	217	993	993	993
02/16/2012	2.58	2.58	2.56	2.56	234	234	933	933	933
02/17/2012	2.75	2.75	2.74	2.74	253	253	976	976	976
02/18/2012	2.66	2.66	2.66	2.66	241	241	1,060	1,060	1,060
02/19/2012	2.62	2.62	2.62	2.62	236	236	1,028	1,028	1,028
02/20/2012	2.58	2.58	2.57	2.57	231	231	1,015	1,015	1,015
02/21/2012	2.51	2.51	2.51	2.51	224	224	998	998	998
02/22/2012	2.47	2.47	2.47	2.47	219	219	973	973	973
02/23/2012	2.51	2.51	2.51	2.51	226	226	947	947	947
02/24/2012	2.56	2.56	2.55	2.55	231	231	951	951	951
02/25/2012	2.60	2.60	2.60	2.60	235	235	962	962	962
02/26/2012	2.65	2.65	2.64	2.64	241	241	968	968	968
02/27/2012	2.70	2.70	2.69	2.69	246	246	987	987	987
02/28/2012	2.60	2.60	2.60	2.60	235	235	1,004	1,004	1,004
02/29/2012	2.78	2.78	2.78	2.78	255	255	970	970	970
03/01/2012	2.78	2.78	2.77	2.77	256	256	1,098	1,098	1,098
03/02/2012	2.72	2.72	2.74	2.74	249	249	1,101	1,101	1,101
03/03/2012	2.61	2.61	2.63	2.62	229	239	1,065	1,065	1,060
03/04/2012	2.29	2.29	2.27	2.27	201	201	964	964	964
03/05/2012	3.57	3.08	3.55	2.79	226	221	839	839	658
03/06/2012	2.93	2.93	2.90	2.90	263	263	778	778	778
03/07/2012	3.11	3.11	3.10	3.10	278	278	1,041	1,041	1,041
03/08/2012	3.14	3.14	3.14	3.14	285	285	1,122	1,122	1,122
03/09/2012	3.15	3.15	3.15	3.15	285	285	1,131	1,131	1,131
03/10/2012	3.22	3.22	3.21	3.21	295	295	1,129	1,129	1,129
03/11/2012	3.16	3.16	3.16	3.16	287	287	1,149	1,149	1,149
03/12/2012	3.13	3.13	3.13	3.13	283	283	1,082	1,082	1,082
03/13/2012	3.19	3.19	3.19	3.19	289	289	1,123	1,123	1,123
03/14/2012	3.09	3.09	3.10	3.10	277	277	1,153	1,153	1,153
03/15/2012	2.97	2.97	2.96	2.96	269	269	1,146	1,146	1,146
03/16/2012	3.04	3.04	3.03	3.03	276	276	1,245	1,245	1,245
03/17/2012	3.12	3.17	3.17	3.17	290	290	1,490	1,490	1,490
03/18/2012	2.97	2.97	2.97	2.97	268	268	1,728	1,728	1,728
03/19/2012	2.98	2.98	2.98	2.98	271	271	1,489	1,489	1,489
03/20/2012	3.13	3.13	3.10	3.10	288	288	1,355	1,355	1,355
03/21/2012	3.16	3.16	3.15	3.15	289	289	1,487	1,487	1,487
03/22/2012	3.07	3.07	3.10	3.10	280	280	1,450	1,450	1,450
03/23/2011	2.83	2.83	2.81	2.81	256	256	1,578	1,578	1,578
03/24/2017	2.96	2.96	2.95	2.95	270	270	1,507	1,507	1,507
03/25/2012	3.12	3.12	3.11	3.11	285	285	1,618	1,618	1,618
03/26/2012	3.19	3.19	3.19	3.19	291	291	1,716	1,716	1,716
03/27/2012	3.25	3.25	3.24	3.24	299	299	1,760	1,760	1,760
03/28/2012	3.05	3.05	3.06	3.06	279	279	1,800	1,800	1,800
03/29/2012	2.99	2.99	2.98	2.98	275	275	1,680	1,680	1,680
03/30/2012	2.97	2.97	2.98	2.98	273	273	1,646	1,646	1,646
03/31/2012	2.90	2.90	2.89	2.89	264	264	1,665	1,665	1,665
04/01/2012	2.97	2.97	2.96	2.96	272	272	1,759	1,759	1,759
04/02/2012	2.97	2.97	2.97	2.97	272	272	1,787	1,787	1,787
04/03/2012	2.98	2.98	3.06	3.06	269	269	1,784	1,784	1,784
04/04/2012	3.18	3.18	3.16	3.16	291	291	1,786	1,786	1,786
04/05/2012	2.97	2.97	3.01	3.01	269	269	1,916	1,916	1,916
04/06/2012	2.80	2.80	2.80	2.80	253	253	1,667	1,667	1,667

Adjusted Daily Values

Date	Raw 15-min SO2 Avg	Adj. 15-min SO2 Avg	Raw 3-hr SO2 Avg	Adj. 3-hr SO2 Avg	Raw ppmv SO2 Avg	Adj. ppmv SO2 Avg	Raw Daily Rate (SO2 lb/day)	Adj. Daily Rate (SO2 lb/day)	Final Daily Rate (SO2 lb/day)
04/07/2012	3.00	3.00	2.98	2.98	277	277	1,477	1,477	1,477
04/08/2012	2.97	2.97	2.97	2.97	275	275	1,585	1,585	1,585
04/09/2012	2.95	2.95	2.94	2.94	271	271	1,559	1,559	1,559
04/10/2012	2.98	2.98	2.97	2.97	275	275	1,550	1,550	1,550
04/11/2012	2.97	2.97	2.97	2.97	273	273	1,562	1,562	1,562
04/12/2012	3.07	3.07	3.06	3.06	279	279	1,558	1,558	1,558
04/13/2012	3.06	3.06	3.07	3.07	275	275	1,613	1,613	1,613
04/14/2012	2.89	2.89	2.89	2.89	262	262	1,579	1,579	1,579
04/15/2012	2.85	2.85	2.85	2.85	257	257	1,515	1,515	1,515
04/16/2012	2.83	2.83	2.82	2.82	255	255	1,488	1,488	1,488
04/17/2012	4.93	4.48	4.95	3.26	278	278	1,481	1,481	975
04/18/2012	3.10	3.10	3.10	3.10	285	285	1,300	1,300	1,300
04/19/2012	3.06	3.06	3.05	3.05	281	281	1,680	1,680	1,680
04/20/2012	3.14	3.14	3.14	3.14	288	288	1,741	1,741	1,741
04/21/2012	3.13	3.13	3.13	3.13	286	286	1,861	1,861	1,861
04/22/2012	3.16	3.16	3.14	3.14	288	288	1,891	1,891	1,891
04/23/2012	3.20	3.20	3.19	3.19	290	290	1,936	1,936	1,936
04/24/2012	3.15	3.15	3.16	3.16	284	284	1,950	1,950	1,950
04/25/2012	3.11	3.11	3.10	3.10	283	283	1,905	1,905	1,905
04/26/2012	3.09	3.09	3.09	3.09	279	279	1,886	1,886	1,886
04/27/2012	3.10	3.10	3.10	3.10	284	284	1,861	1,861	1,861
04/28/2012	3.12	3.12	3.12	3.12	289	289	1,846	1,846	1,846
04/29/2012	3.12	3.12	3.11	3.11	287	287	1,873	1,873	1,873
04/30/2012	3.12	3.12	3.12	3.12	288	288	1,873	1,873	1,873
05/01/2012	2.87	3.10	2.87	2.87	289	289	1,867	1,867	1,867
05/02/2012	3.15	3.15	3.13	3.13	289	289	1,672	1,872	1,872
05/03/2012	3.18	3.18	3.19	3.19	292	292	1,880	1,880	1,880
05/04/2012	3.05	3.05	3.05	3.05	278	278	1,887	1,887	1,887
05/05/2012	3.07	3.07	3.08	3.08	281	281	1,806	1,806	1,806
05/06/2012	2.99	2.99	2.99	2.99	273	273	1,820	1,820	1,820
05/07/2012	2.99	2.99	2.98	2.98	273	273	1,782	1,782	1,782
05/08/2012	2.96	2.96	2.97	2.97	271	271	1,786	1,786	1,786
05/09/2012	2.92	2.92	2.92	2.92	267	267	1,769	1,769	1,769
05/10/2012	2.97	2.97	7.96	2.96	272	272	1,752	1,752	1,752
05/11/2012	2.89	2.89	2.90	2.90	263	263	1,819	1,819	1,819
05/12/2012	2.93	2.93	2.91	2.91	264	264	1,858	1,858	1,858
05/13/2012	3.08	3.08	3.06	3.06	278	278	1,901	1,901	1,901
05/14/2012	3.15	3.15	3.15	3.15	286	286	2,018	2,018	2,018
05/15/2012	3.22	3.22	3.21	3.21	295	295	2,083	2,083	2,083
05/16/2012	3.20	3.20	3.22	3.22	290	290	2,152	2,152	2,152
05/17/2012	2.98	2.98	2.98	2.98	271	271	2,113	2,113	2,113
05/18/2012	3.06	3.06	3.04	3.04	281	281	1,825	1,825	1,825
05/19/2012	3.22	3.22	3.21	3.21	297	297	1,674	1,674	1,674
05/20/2012	3.29	3.29	3.29	3.29	306	306	2,081	2,081	2,081
05/21/2012	3.18	3.18	3.19	3.19	291	291	2,158	2,158	2,158
05/22/2012	3.20	3.20	3.20	3.20	292	292	2,069	2,069	2,069
05/23/2012	3.19	3.19	3.18	3.18	291	291	2,075	2,075	2,075
05/24/2012	5.45	4.06	5.45	3.37	335	330	2,069	2,069	1,281
05/25/2012	3.32	3.32	3.32	3.32	306	306	1,948	1,948	1,948
05/26/2012	3.38	3.38	3.38	3.38	312	312	2,127	2,127	2,127
05/27/2012	3.40	3.40	3.40	3.40	314	314	2,199	2,199	2,199
05/28/2012	3.35	3.35	3.34	3.34	309	309	2,205	2,205	2,205
05/29/2012	3.33	3.33	3.33	3.33	306	306	2,178	2,178	2,178
05/30/2012	3.20	3.20	3.20	3.20	293	293	2,162	2,162	2,162
05/31/2012	3.22	3.22	3.22	3.22	296	296	2,083	2,083	2,083
06/01/2012	3.11	3.11	3.04	3.04	269	269	2,100	2,100	2,100
06/02/2012	3.30	3.30	3.30	3.30	301	301	1,488	1,488	1,488
06/03/2012	3.25	3.25	3.26	3.26	295	295	2,161	2,161	2,161
06/04/2012	3.34	3.34	3.33	3.33	305	305	2,134	2,134	2,134
06/05/2012	3.22	3.36	3.28	3.28	314	314	2,191	2,191	2,191
06/06/2012	3.25	3.25	3.26	3.26	298	298	2,232	2,232	2,232
06/07/2012	3.15	3.15	3.15	3.15	287	287	2,144	2,144	2,144

Adjusted Daily Values

Date	Raw 15-min SO2 Avg	Adj. 15-min SO2 Avg	Raw 3-hr SO2 Avg	Adj. 3-hr SO2 Avg	Raw ppmv SO2 Avg	Adj. ppmv SO2 Avg	Raw Daily Rate (SO2 lb/day)	Adj. Daily Rate (SO2 lb/day)	Final Daily Rate (SO2 lb/day)
06/08/2012	3.24	3.24	3.23	3.23	297	297	2,081	2,081	2,081
06/09/2012	3.15	3.15	3.15	3.15	287	287	2,140	2,140	2,140
06/10/2012	3.27	3.27	3.25	3.25	298	298	2,081	2,081	2,081
06/11/2012	3.25	3.25	3.25	3.25	293	293	2,164	2,164	2,164
06/12/2012	3.04	3.04	3.05	3.05	273	273	2,137	2,137	2,137
06/13/2012	3.07	3.07	3.06	3.06	278	278	2,000	2,000	2,000
06/14/2012	3.10	3.10	3.09	3.09	280	280	2,024	2,024	2,024
06/15/2012	2.93	2.93	2.94	2.94	265	265	2,047	2,047	2,047
06/16/2012	2.77	2.77	2.77	2.77	253	253	1,932	1,932	1,932
06/17/2012	2.90	2.90	2.87	2.87	263	263	1,822	1,822	1,822
06/18/2012	2.98	2.98	3.00	3.00	268	268	1,916	1,916	1,916
06/19/2012	0.00	0.00	0.00	0.00	0	0	0	0	0
06/20/2012	69.98	21.16	69.19	4.00	157	157	156	156	9
06/21/2012	16.33	7.43	17.60	2.99	54	54	87	87	15
06/22/2012	75.07	11.86	74.71	3.75	334	334	89	89	4
06/23/2012	3.18	3.18	3.16	3.16	292	292	882	882	882
06/24/2012	3.38	3.38	3.37	3.37	314	314	1,935	1,935	1,935
06/25/2012	3.36	3.36	3.35	3.35	312	312	2,278	2,278	2,278
06/26/2012	3.46	3.46	3.46	3.46	325	325	2,274	2,274	2,274
06/27/2012	3.43	3.43	3.43	3.43	323	323	2,359	2,359	2,359
06/28/2012	3.43	3.43	3.43	3.43	322	322	2,332	2,332	2,332
06/29/2012	3.35	3.35	3.34	3.34	311	311	2,325	2,325	2,325
06/30/2012	3.42	3.42	3.42	3.42	319	319	2,270	2,270	2,270
07/01/2012	3.42	3.42	3.41	3.41	320	320	2,328	2,328	2,328
07/02/2012	3.41	3.41	3.41	3.41	318	318	2,340	2,340	2,340
07/03/2012	3.42	3.42	3.43	3.43	311	311	2,320	2,320	2,320
07/04/2012	3.48	3.48	3.47	3.47	323	323	2,270	2,270	2,270
07/05/2012	3.45	3.45	3.44	3.44	319	319	2,347	2,347	2,347
07/06/2012	3.45	3.45	3.45	3.45	319	319	2,338	2,338	2,338
07/07/2012	3.37	3.37	3.37	3.37	310	310	2,331	2,331	2,331
07/08/2012	3.34	3.34	3.34	3.34	307	307	2,259	2,259	2,259
07/09/2012	3.35	3.35	3.35	3.35	307	307	2,240	2,240	2,240
07/10/2012	3.43	3.43	3.42	3.42	318	318	2,237	2,237	2,237
07/11/2012	3.43	3.43	3.43	3.43	318	318	2,299	2,299	2,299
07/12/2012	3.38	3.38	3.38	3.38	313	313	2,289	2,289	2,289
07/13/2012	3.39	3.39	3.37	3.37	311	311	2,252	2,252	2,252
07/14/2012	3.43	3.43	3.43	3.43	316	316	2,273	2,273	2,273
07/15/2012	3.47	3.47	3.46	3.46	321	321	2,306	2,306	2,306
07/16/2012	3.44	3.44	3.44	3.44	318	318	2,329	2,329	2,329
07/17/2012	3.07	3.07	3.14	3.14	276	276	2,327	2,327	2,327
07/18/2012	3.43	3.43	3.42	3.42	316	316	1,688	1,688	1,688
07/19/2012	3.48	3.48	3.48	3.48	320	320	2,235	2,235	2,235
07/20/2012	3.39	3.39	3.38	3.38	307	307	2,322	2,322	2,322
07/21/2012	3.52	3.52	3.52	3.52	323	323	1,633	1,633	1,633
07/22/2012	3.42	3.42	3.42	3.42	304	304	2,326	2,326	2,326
07/23/2012	3.39	3.39	3.39	3.39	311	311	2,199	2,199	2,199
07/24/2012	3.48	3.48	3.47	3.47	322	322	2,250	2,250	2,250
07/25/2012	3.49	3.49	3.48	3.48	323	323	2,336	2,336	2,336
07/26/2012	3.43	3.43	3.43	3.43	317	317	2,344	2,344	2,344
07/27/2012	3.33	3.33	3.32	3.32	305	305	2,302	2,302	2,302
07/28/2012	3.47	3.47	3.46	3.46	322	322	2,225	2,225	2,225
07/29/2012	3.44	3.44	3.44	3.44	320	320	2,340	2,340	2,340
07/30/2012	3.48	3.48	3.48	3.48	325	325	2,322	2,322	2,322
07/31/2012	3.48	3.48	3.48	3.48	324	324	2,340	2,340	2,340
08/01/2012	3.50	3.50	3.49	3.49	325	325	2,339	2,339	2,339
08/02/2012	79.39	11.41	76.74	3.65	370	350	0	0	0
08/03/2012	3.21	3.21	3.19	3.19	292	292	699	699	699
08/04/2012	3.14	3.14	3.14	3.14	282	282	1,365	1,365	1,365
08/05/2012	3.17	3.17	3.17	3.17	286	286	1,362	1,362	1,362
08/06/2012	3.14	3.14	3.15	3.15	283	282	1,371	1,371	1,371
08/07/2012	2.71	3.37	2.65	3.03	314	314	1,486	1,486	1,486
08/08/2012	3.44	3.44	3.44	3.44	318	318	2,317	2,317	2,317

Adjusted Daily Values

Date	Raw 15-min SO2 Avg	Adj. 15-min SO2 Avg	Raw 3-hr SO2 Avg	Adj. 3-hr SO2 Avg	Raw ppmv SO2 Avg	Adj. ppmv SO2 Avg	Raw Daily Rate (SO2 lb/day)	Adj. Daily Rate (SO2 lb/day)	Final Daily Rate (SO2 lb/day)
08/09/2012	3.37	3.37	3.37	3.37	299	299	2,335	2,335	2,335
08/10/2012	3.41	3.41	3.40	3.40	316	316	1,989	1,989	1,989
08/11/2012	3.50	3.50	3.49	3.49	323	323	2,276	2,276	2,276
08/12/2012	4.06	3.69	4.02	3.55	318	318	2,368	2,368	2,092
08/13/2012	3.44	3.44	3.44	3.44	316	316	2,323	2,323	2,323
08/14/2012	3.25	3.25	3.25	3.25	297	297	2,310	2,310	2,310
08/15/2012	3.39	3.39	3.37	3.37	306	306	2,154	2,154	2,154
08/16/2012	3.34	3.34	3.33	3.33	299	299	2,207	2,207	2,207
08/17/2012	3.36	3.36	3.36	3.36	305	305	1,918	1,918	1,918
08/18/2012	3.49	3.49	3.49	3.49	320	320	1,520	1,520	1,520
08/19/2012	3.52	3.52	3.52	3.52	324	324	1,584	1,584	1,584
08/20/2012	3.52	3.52	3.51	3.51	323	323	1,598	1,598	1,598
08/21/2012	3.54	3.54	3.54	3.54	325	325	1,593	1,593	1,593
08/22/2012	3.52	3.52	3.51	3.51	322	322	1,601	1,601	1,601
08/23/2012	3.48	3.48	3.49	3.49	317	317	1,580	1,580	1,580
08/24/2012	3.42	3.42	3.42	3.42	309	309	1,563	1,563	1,563
08/25/2012	7.98	3.67	3.34	3.39	318	318	1,535	1,535	1,535
08/26/2012	3.23	3.23	2.82	3.00	291	291	1,569	1,569	1,569
08/27/2012	3.26	3.26	3.23	3.23	297	297	1,455	1,455	1,455
08/28/2012	3.15	3.15	3.17	3.17	283	283	1,442	1,442	1,442
08/29/2012	3.24	3.24	3.22	3.22	296	296	1,349	1,349	1,349
08/30/2012	3.27	3.27	3.26	3.26	300	300	1,438	1,438	1,438
08/31/2012	3.28	3.28	3.28	3.28	299	299	1,484	1,484	1,484
09/01/2012	3.22	3.22	3.22	3.22	291	291	1,484	1,484	1,484
09/02/2012	3.10	3.10	3.10	3.10	278	278	1,453	1,453	1,453
09/03/2012	3.09	3.09	3.08	3.08	279	279	1,400	1,400	1,400
09/04/2012	3.25	3.25	3.24	3.23	284	284	1,401	1,401	1,396
09/05/2012	3.03	3.03	3.02	3.02	272	272	1,417	1,417	1,417
09/06/2012	3.29	3.29	3.30	3.30	306	306	1,369	1,369	1,369
09/07/2012	3.08	3.08	3.07	3.07	278	278	1,530	1,530	1,530
09/08/2012	3.36	3.36	3.34	3.34	309	309	1,642	1,642	1,642
09/09/2012	3.30	3.30	3.31	3.31	299	299	2,181	2,181	2,181
09/10/2012	3.29	3.29	3.29	3.29	297	297	2,201	2,201	2,201
09/11/2012	3.33	3.33	3.32	3.32	302	302	2,203	2,203	2,203
09/12/2012	3.29	3.29	3.29	3.29	297	297	2,231	2,231	2,231
09/13/2012	3.32	3.32	3.31	3.31	302	302	2,200	2,200	2,200
09/14/2012	3.39	3.39	3.39	3.39	312	312	2,218	2,218	2,218
09/15/2012	3.39	3.39	3.38	3.38	312	312	2,267	2,267	2,267
09/16/2012	3.16	3.16	3.18	3.18	290	290	2,268	2,268	2,268
09/17/2012	3.25	3.25	3.24	3.24	301	301	1,801	1,801	1,801
09/18/2012	3.31	3.31	3.31	3.31	304	304	1,859	1,859	1,859
09/19/2012	3.36	3.36	3.35	3.35	308	308	2,103	2,103	2,103
09/20/2012	3.37	3.37	3.38	3.38	310	310	2,132	2,132	2,132
09/21/2012	3.32	3.32	3.31	3.31	304	304	2,138	2,139	2,139
09/22/2012	0.00	0.00	0.00	0.00	0	0	0	0	0
09/23/2012	0.00	0.00	0.00	0.00	0	0	0	0	0
09/24/2012	0.00	0.00	0.00	0.00	0	0	0	0	0
09/25/2012	0.00	0.00	0.00	0.00	0	0	0	0	0
09/26/2012	0.00	0.00	0.00	0.00	0	0	0	0	0
09/27/2012	0.00	0.00	0.00	0.00	0	0	0	0	0
09/28/2012	0.00	0.00	0.00	0.00	0	0	0	0	0
09/29/2012	0.00	0.00	0.00	0.00	0	0	0	0	0
09/30/2012	0.00	0.00	0.00	0.00	0	0	0	0	0
10/01/2012	0.00	0.00	0.00	0.00	0	0	0	0	0
10/02/2012	0.00	0.00	0.00	0.00	0	0	0	0	0
10/03/2012	0.00	0.00	0.00	0.00	0	0	0	0	0
10/04/2012	0.00	0.00	0.00	0.00	0	0	0	0	0
10/05/2012	0.00	0.00	0.00	0.00	0	0	0	0	0
10/06/2012	0.00	0.00	0.00	0.00	0	0	0	0	0
10/07/2012	0.00	0.00	0.00	0.00	0	0	0	0	0
10/08/2012	0.00	0.00	0.00	0.00	0	0	0	0	0
10/09/2012	0.00	0.00	0.00	0.00	0	0	0	0	0

Adjusted Daily Values

Date	Raw 15-min SO2 Avg	Adj. 15-min SO2 Avg	Raw 3-hr SO2 Avg	Adj. 3-hr SO2 Avg	Raw ppmv SO2 Avg	Adj. ppmv SO2 Avg	Raw Daily Rate (SO2 lb/day)	Adj. Daily Rate (SO2 lb/day)	Final Daily Rate (SO2 lb/day)
10/10/2012	0.00	0.00	0.00	0.00	0	0	0	0	0
10/11/2012	0.00	0.00	0.00	0.00	0	0	0	0	0
10/12/2012	0.00	0.00	0.00	0.00	0	0	0	0	0
10/13/2012	2675.62	21.50	2392.41	4.00	1,625	1,358	0	0	0
10/14/2012	180.85	16.25	267.45	4.00	1,519	1,069	311	311	5
10/15/2012	159.68	15.61	159.45	4.00	427	427	525	525	13
10/16/2012	32.25	6.89	37.61	3.47	481	404	493	493	52
10/17/2012	3.21	3.21	3.21	3.21	286	286	1,732	1,732	1,732
10/18/2012	25.58	11.69	16.79	3.56	548	469	1,654	1,654	351
10/19/2012	19.33	17.13	19.71	4.00	319	315	1,673	1,673	340
10/20/2012	8.10	8.10	8.67	3.42	224	224	2,261	2,261	891
10/21/2012	2.90	2.90	2.88	2.88	250	250	1,408	1,408	1,408
10/22/2012	3.15	3.15	3.14	3.14	289	289	1,512	1,512	1,512
10/23/2012	3.10	3.10	3.10	3.10	278	278	1,762	1,762	1,762
10/24/2012	3.28	3.28	3.27	3.27	301	301	2,252	2,252	2,252
10/25/2012	3.21	3.21	3.22	3.22	293	293	1,833	1,833	1,833
10/26/2012	3.20	3.20	3.19	3.19	293	293	1,785	1,785	1,785
10/27/2012	3.26	3.26	3.27	3.27	297	297	1,784	1,784	1,784
10/28/2012	3.00	3.00	2.99	2.99	267	267	1,816	1,816	1,816
10/29/2012	3.01	3.01	3.01	3.01	269	269	1,670	1,670	1,670
10/30/2012	3.06	3.06	3.06	3.06	276	276	1,671	1,671	1,671
10/31/2012	3.17	3.17	3.15	3.15	288	288	1,702	1,702	1,702
11/01/2012	3.21	3.21	3.21	3.21	293	293	1,763	1,763	1,763
11/02/2012	3.26	3.26	3.26	3.26	299	299	1,786	1,786	1,786
11/03/2012	3.20	3.20	3.20	3.20	293	293	1,809	1,809	1,809
11/04/2012	3.15	3.15	3.15	3.15	287	287	1,778	1,778	1,778
11/05/2012	3.15	3.15	3.14	3.14	288	288	1,746	1,746	1,746
11/06/2012	3.25	3.25	3.25	3.25	296	296	1,742	1,742	1,742
11/07/2012	3.39	3.39	3.37	3.37	310	310	1,775	1,775	1,775
11/08/2012	3.41	3.41	3.41	3.41	311	311	1,879	1,879	1,879
11/09/2012	3.47	3.47	3.47	3.47	316	316	1,908	1,908	1,908
11/10/2012	3.53	3.53	3.53	3.53	324	324	1,934	1,934	1,934
11/11/2012	3.46	3.46	3.45	3.45	316	316	1,960	1,960	1,960
11/12/2012	3.48	3.48	3.48	3.48	320	320	1,915	1,915	1,915
11/13/2012	3.34	3.34	3.34	3.34	304	304	1,924	1,924	1,924
11/14/2012	3.36	3.36	3.35	3.35	304	304	1,850	1,850	1,850
11/15/2012	3.32	3.32	3.35	3.35	300	300	1,883	1,883	1,883
11/16/2012	3.37	3.37	3.36	3.36	298	298	1,919	1,919	1,919
11/17/2012	3.36	3.36	3.35	3.35	300	300	1,907	1,907	1,907
11/18/2012	3.45	3.45	3.45	3.45	313	313	1,957	1,957	1,957
11/19/2012	3.36	3.36	3.36	3.36	305	305	2,006	2,006	2,006
11/20/2012	3.38	3.38	3.37	3.37	306	306	1,947	1,947	1,947
11/21/2012	3.24	3.24	3.25	3.25	291	291	1,955	1,955	1,955
11/22/2012	3.25	3.25	3.25	3.25	292	292	1,880	1,880	1,880
11/23/2012	3.21	3.21	3.21	3.21	285	285	1,877	1,877	1,877
11/24/2012	3.22	3.22	3.20	3.20	286	286	1,847	1,847	1,847
11/25/2012	3.33	3.33	3.34	3.34	299	299	1,847	1,847	1,847
11/26/2012	3.23	3.23	3.24	3.24	288	288	1,930	1,930	1,930
11/27/2012	3.34	3.34	3.33	3.33	298	298	1,866	1,866	1,866
11/28/2012	3.52	3.52	3.51	3.51	318	318	1,920	1,920	1,920
11/29/2012	3.52	3.52	3.52	3.52	318	318	2,036	2,036	2,036
11/30/2012	3.51	3.51	3.52	3.52	317	317	2,041	2,041	2,041
12/01/2012	3.33	3.33	3.33	3.33	301	301	2,054	2,054	2,054
12/02/2012	3.42	3.42	3.42	3.42	310	310	1,946	1,946	1,946
12/03/2012	3.37	3.37	3.36	3.36	305	305	1,911	1,911	1,911
12/04/2012	30965.01	12.17	27035.37	3.80	984	704	1,708	1,708	0
12/05/2012	2960.27	14.71	7061.26	3.43	719	467	696	696	0
12/06/2012	39.23	12.75	100.52	3.80	218	218	34	34	1
12/07/2012	2957.55	6.28	2570.46	3.35	228	228	545	545	1
12/08/2012	3.14	3.14	3.17	3.12	292	292	823	823	823
12/09/2012	3.00	3.00	3.00	3.00	278	278	1,410	1,410	1,410
12/10/2012	2.49	2.49	2.51	2.51	223	223	1,350	1,350	1,350

Adjusted Daily Values

Date	Raw 15-min SO2 Avg	Adj. 15-min SO2 Avg	Raw 3-hr SO2 Avg	Adj. 3-hr SO2 Avg	Raw ppmv SO2 Avg	Adj. ppmv SO2 Avg	Raw Daily Rate (SO2 lb/day)	Adj. Daily Rate (SO2 lb/day)	Final Daily Rate (SO2 lb/day)
12/11/2012	2.85	2.85	2.82	2.82	260	260	1,067	1,067	1,067
12/12/2012	2.91	2.91	2.90	2.90	262	262	1,097	1,097	1,097
12/13/2012	3.03	3.03	3.05	3.05	276	276	1,049	1,049	1,049
12/14/2012	3.03	3.03	3.00	3.00	276	276	1,078	1,078	1,078
12/15/2012	2.92	2.92	2.92	2.92	265	265	1,049	1,049	1,049
12/16/2012	3.12	3.12	3.11	3.11	285	285	1,007	1,007	1,007
12/17/2012	3.10	3.10	3.11	3.11	283	283	1,071	1,071	1,071
12/18/2012	3.10	3.10	3.10	3.10	283	283	1,070	1,070	1,070
12/19/2012	2.58	2.58	2.62	2.62	233	233	1,060	1,060	1,060
12/20/2012	2.58	2.58	2.56	2.56	237	237	1,075	1,075	1,075
12/21/2012	2.47	2.47	2.47	2.47	225	225	1,453	1,453	1,453
12/22/2012	2.50	2.50	2.49	2.49	226	226	1,393	1,393	1,393
12/23/2012	2.51	2.51	2.51	2.51	228	228	1,406	1,406	1,406
12/24/2012	2.46	2.46	2.47	2.47	221	221	1,418	1,418	1,418
12/25/2012	2.43	2.43	2.41	2.41	221	221	1,377	1,377	1,377
12/26/2012	2.47	2.47	2.46	2.46	224	224	1,359	1,359	1,359
12/27/2012	2.45	2.45	2.46	2.46	221	221	1,386	1,386	1,386
12/28/2012	2.38	2.38	2.36	2.36	215	215	1,232	1,232	1,232
12/29/2012	2.64	2.64	2.64	2.64	240	240	1,048	1,048	1,048
12/30/2012	2.62	2.62	2.60	2.60	240	240	1,165	1,165	1,165
12/31/2012	2.56	2.56	2.58	2.58	230	230	1,087	1,087	1,087
01/01/2013	3.01	3.01	3.00	3.00	274	274	833	833	833
01/02/2013	3.01	3.01	3.00	3.00	272	272	1,084	1,084	1,084
01/03/2013	2.98	2.98	2.98	2.98	270	270	1,089	1,089	1,089
01/04/2013	2.99	2.99	2.98	2.98	272	272	1,077	1,077	1,077
01/05/2013	3.00	3.00	3.05	3.05	271	271	1,077	1,077	1,077
01/06/2013	2.89	2.89	2.82	2.82	258	258	1,057	1,057	1,057
01/07/2013	3.29	3.29	3.32	3.32	300	300	986	986	986
01/08/2013	2.54	2.69	2.56	2.56	245	245	1,172	1,172	1,172
01/09/2013	5.85	3.15	5.85	2.71	210	210	965	965	446
01/10/2013	2.39	2.39	2.40	2.40	217	217	723	723	723
01/11/2013	2.26	2.26	2.26	2.26	203	203	865	865	865
01/12/2013	9.87	5.08	9.96	2.92	237	237	837	837	246
01/13/2013	2.36	2.36	2.37	2.37	213	213	709	709	709
01/14/2013	2.47	2.47	2.46	2.46	225	225	839	839	839
01/15/2013	3.06	3.06	3.02	2.80	225	225	876	876	812
01/16/2013	2.73	2.73	2.74	2.74	250	250	841	841	841
01/17/2013	2.69	2.69	2.68	2.68	245	245	978	978	978
01/18/2013	2.55	2.55	2.55	2.55	230	230	958	958	958
01/19/2013	2.51	2.51	2.51	2.51	225	225	903	903	903
01/20/2013	2.52	2.52	2.50	2.50	227	227	899	899	899
01/21/2013	2.67	2.67	2.67	2.67	242	242	909	909	909
01/22/2013	2.74	2.74	2.73	2.73	250	250	967	967	967
01/23/2013	2.87	2.87	2.88	2.88	262	262	988	988	988
01/24/2013	2.74	2.74	2.74	2.74	248	248	1,033	1,033	1,033
01/25/2013	2.75	2.75	2.75	2.75	251	251	989	989	989
01/26/2013	2.77	2.77	2.76	2.76	254	254	1,000	1,000	1,000
01/27/2013	2.68	2.68	2.68	2.68	242	242	1,006	1,006	1,006
01/28/2013	2.74	2.74	2.74	2.74	250	250	956	956	956
01/29/2013	2.68	2.68	2.68	2.68	243	243	989	989	989
01/30/2013	2.68	2.68	2.66	2.66	245	245	962	962	962
01/31/2013	2.72	2.72	2.71	2.71	247	247	960	960	960
02/01/2013	2.60	2.60	2.61	2.61	235	235	973	973	973
02/02/2013	2.70	2.70	2.70	2.70	245	245	924	924	924
02/03/2013	2.80	2.80	2.80	2.80	256	256	965	965	965
02/04/2013	2.60	2.60	2.59	2.59	235	235	1,004	1,004	1,004
02/05/2013	10.48	2.82	11.69	2.78	238	238	934	934	272
02/06/2013	2.74	2.74	2.75	2.75	250	250	951	951	951
02/07/2013	2.71	2.71	2.70	2.70	245	245	991	991	991
02/08/2013	2.63	2.63	2.64	2.64	239	239	965	965	965
02/09/2013	2.54	2.54	2.55	2.55	230	230	767	767	767
02/10/2013	2.51	2.51	2.50	2.50	226	226	934	934	534

Adjusted Daily Values

Date	Raw 15-min SO2 Avg	Adj. 15-min SO2 Avg	Raw 3-hr SO2 Avg	Adj. 3-hr SO2 Avg	Raw ppmv SO2 Avg	Adj. ppmv SO2 Avg	Raw Daily Rate (SO2 lb/day).	Adj. Daily Rate (SO2 lb/day)	Final Daily Rate (SO2 lb/day)
02/11/2013	2.51	2.51	2.51	2.51	228	228	913	913	913
02/12/2013	2.38	2.38	2.39	2.39	215	215	910	910	910
02/13/2013	2.31	2.31	2.31	2.31	211	211	935	935	935
02/14/2013	2.20	2.20	2.19	2.19	199	199	1,040	1,040	1,040
02/15/2013	2.18	2.18	2.18	2.18	198	198	991	991	991
02/16/2013	2.13	2.13	2.13	2.13	193	193	1,039	1,039	1,039
02/17/2013	2.11	2.11	2.11	2.11	190	190	1,067	1,067	1,067
02/18/2013	2.21	2.21	2.19	2.19	200	200	1,059	1,059	1,059
02/19/2013	2.14	2.14	2.14	2.14	193	193	1,101	1,101	1,101
02/20/2013	2.24	2.24	2.23	2.23	204	204	1,074	1,074	1,074
02/21/2013	2.23	2.23	2.23	2.23	204	204	1,121	1,121	1,121
02/22/2013	2.18	2.18	2.18	2.18	199	199	1,184	1,184	1,184
02/23/2013	2.37	2.37	2.36	2.36	219	219	1,289	1,289	1,289
02/24/2013	2.30	2.30	2.30	2.30	211	211	1,493	1,493	1,493
02/25/2013	2.19	2.19	2.19	2.19	200	200	1,447	1,447	1,447
02/26/2013	2.32	2.32	2.32	2.32	215	215	1,386	1,386	1,386
02/27/2013	2.19	2.19	2.19	2.19	200	200	1,469	1,469	1,469
02/28/2013	2.19	2.19	2.19	2.19	200	200	1,389	1,389	1,389
03/01/2013	2.10	2.10	2.10	2.10	190	190	1,386	1,386	1,386
03/02/2013	2.32	2.32	2.31	2.31	215	215	1,362	1,362	1,362
03/03/2013	2.39	2.39	2.37	2.37	222	222	1,526	1,526	1,526
03/04/2013	2.46	2.46	2.46	2.46	227	227	1,573	1,573	1,573
03/05/2013	2.61	2.61	2.61	2.61	230	230	1,618	1,618	1,618
03/06/2013	2.51	2.51	2.51	2.51	230	230	1,634	1,634	1,634
03/07/2013	2.63	2.63	2.62	1.62	243	243	1,648	1,648	1,648
03/08/2013	2.51	2.51	2.51	2.51	229	229	1,730	1,730	1,730
03/09/2013	121.33	17.86	109.96	3.77	1,811	1,483	1,670	1,670	57
03/10/2013	456.87	10.75	479.66	2.43	713	566	299	299	2
03/11/2013	5.16	5.06	5.13	2.38	140	140	0	0	0
03/12/2013	1352.31	13.40	1648.90	3.67	775	681	250	250	1
03/13/2013	0.00	4.54	0.00	1.50	281	281	188	188	0
03/14/2013	0.00	7.23	0.00	2.02	392	386	83	83	0
03/15/2013	2.94	2.94	0.00	2.65	264	264	604	604	0
03/16/2013	2.61	2.61	2.62	2.62	234	234	987	987	987
03/17/2013	2.43	2.43	2.41	2.41	218	218	899	899	899
03/18/2013	2.20	2.20	2.17	2.17	210	210	899	899	899
03/19/2013	2.07	2.07	2.05	2.05	200	200	899	899	899
03/20/2013	1.97	1.97	1.99	1.99	192	192	899	899	899
03/21/2013	1.93	1.93	1.92	1.92	184	184	3,212	2,461	2,461
03/22/2013	1.98	1.98	1.98	1.98	177	177	1,048	1,048	1,048
03/23/2013	1.98	1.98	1.98	1.98	181	181	1,086	1,086	1,086
03/24/2013	2.01	2.01	2.01	2.01	185	185	1,091	1,091	1,091
03/25/2013	2.00	2.00	2.00	2.00	184	184	1,118	1,118	1,118
03/26/2013	1.97	1.97	1.97	1.97	181	181	1,119	1,119	1,119
03/27/2013	1.93	1.93	1.97	1.97	176	176	1,110	1,110	1,110
01/28/2013	1.92	1.92	1.93	1.93	176	176	1,086	1,086	1,086
03/29/2013	1.90	1.90	1.90	1.90	175	175	1,084	1,084	1,084
03/30/2013	1.92	1.92	1.91	1.91	178	178	1,080	1,080	1,080
03/31/2013	1.99	1.99	1.98	1.98	184	184	1,097	1,097	1,097

Appendix C

Permit to Operate N-767-9-16

San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: N-767-9-16 **EXPIRATION DATE:** 11/30/2014

EQUIPMENT DESCRIPTION:
SULFURIC ACID PRODUCTION PLANT CONSISTING OF A SULFUR FURNACE, TWO CONVERTERS, SIX WASTE HEAT RECOVERY BOILERS, A DRYING TOWER WITH AN ENTRAINMENT SEPARATOR, AN INTERSTAGE ABSORPTION TOWER WITH A MIST ELIMINATOR, A FINAL TOWER WITH A MIST ELIMINATOR, 15.0 MMBTU/HR SUR-LITE CORP. MODEL 6-H250 TT NATURAL GAS-FIRED FURNACE IGNITER BURNER (4919-H-303), AND ASSOCIATED EQUIPMENT.

PERMIT UNIT REQUIREMENTS

1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201 and 4202] Federally Enforceable Through Title V Permit
2. The overall oxides of sulfur emissions as SO2 from the sulfuric acid plant (including fugitive sulfur compound leak emissions) shall not exceed 2.5 pounds per ton of 100% sulfuric acid produced except during periods of start-up and shutdown. [District Rule 2201] Federally Enforceable Through Title V Permit
3. The overall oxides of sulfur emissions as SO2 from the sulfuric acid plant (including fugitive sulfur compound leak emissions) shall not exceed 21.5 pounds per ton of 100% sulfuric acid produced during periods of start-up and shutdown. This performance based limit is to enforce the SOx emission reductions granted by certificate N-74-5 and under project #N-1131840. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Emissions of oxides of sulfur as SO2 from the entire sulfuric acid plant (including fugitive sulfur compound leak emissions) shall not exceed 1,750 pounds during any one day and 410,296 pounds during any 12-consecutive month period. This performance based limit is to enforce the SOx emission reductions granted by certificate N-75-5 and under project #N-1131840. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Sulfur compound emissions from the sulfuric acid plant exhaust stack shall not exceed 0.2% by volume, 2000 ppmv, on a dry basis averaged over 15 consecutive minutes. [District Rule 4801 and Rule 407 (San Joaquin)] Federally Enforceable Through Title V Permit
6. The facility shall not discharge into the atmosphere any gases which contain acid mist, expressed as sulfuric acid, in excess of 0.3 pounds per ton of 100% sulfuric acid produced. [District Rules 2201 and 4802] Federally Enforceable Through Title V Permit
7. The oxides of sulfur emissions as SO2 from the sulfuric acid plant shall be determined using the procedures specified in 40 CFR 60.84. [District Rule 2201 and 40 CFR Part 60, Subpart H] Federally Enforceable Through Title V Permit
8. The quantity of sulfuric acid produced shall not exceed 700 tons during any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
9. NOx emissions from the sulfur furnace serving the sulfuric acid plant shall not exceed 0.154 lb-NOx per ton of sulfuric acid produced. [District Rule 2201] Federally Enforceable Through Title V Permit
10. The Sur-Lite Corp. furnace igniter burner shall only be fired on natural gas. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Heat input to the Sur-Lite Corp. furnace igniter burner shall not exceed 21,000 MMBtu in any one rolling 12 month period. [District Rule 2201] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

12. The Sur-Lite Corp. furnace igniter burner shall be equipped with an operational non-resettable totalizing mass or volumetric fuel flow meter to measure the amount of natural gas combusted in the igniter burner or other District approved alternative. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Emissions from the Sur-Lite Corp. furnace igniter burner shall not exceed any of the following limits: 0.061 lb-NOx/MMBtu, 0.00285 lb-SOx/MMBtu, 0.005 lb-PM10/MMBtu, 0.035 lb-CO/MMBtu, or 0.003 lb-VOC/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
14. A source test for oxides of sulfur shall be conducted on an annual basis. [District Rule 1081] Federally Enforceable Through Title V Permit
15. The results of each test shall be submitted for District evaluation no later than 60 days following each test. [District Rule 1081] Federally Enforceable Through Title V Permit
16. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
17. Source testing to measure concentrations of oxides of sulfur shall be conducted using either CARB Method 6, CARB Method 8, CARB Method 100, EPA Method 6, or EPA Method 8. [District Rule 1081] Federally Enforceable Through Title V Permit
18. Source testing to measure stack gas flow rate, moisture content, and oxygen content shall be conducted using EPA Methods 1 thru 4. [District Rule 1081] Federally Enforceable Through Title V Permit
19. An hourly log of sulfuric acid produced by each process line shall be kept on the premises at all times and shall be made available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit
20. The permittee shall provide, properly install and maintain in proper working order, continuous monitoring and recording systems to measure oxides of sulfur emissions as SO2. [District Rule 1080, 5.2.1] Federally Enforceable Through Title V Permit
21. The averaging time for the SO2 emission monitoring system shall not exceed 15 minutes. [District Rule 2080] Federally Enforceable Through Title V Permit
22. All continuous monitoring and recording instruments shall be installed, calibrated and operated in accordance with the requirements of 40 CFR 60.84. [District Rule 1080, 6.1.2] Federally Enforceable Through Title V Permit
23. The permittee shall submit a written report for each calendar quarter to the District no later than 30 days following the end of each calendar quarter. The report shall comply with all of the requirements of the District rules. [District Rule 1080, 8.0] Federally Enforceable Through Title V Permit
24. The sampling probe of the continuous monitoring analyzer system shall be replaced with a clean probe at least once per month to prevent emission data gaps due to probe failure. [District Rule 2080] Federally Enforceable Through Title V Permit
25. Invalid SO2 emission readings caused by the changing of the probe shall not exceed a period of two hours for each probe change. [District Rule 2080] Federally Enforceable Through Title V Permit
26. A written log indicating the date and time of each probe change shall be kept on the premise and shall be made available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit
27. Source testing to measure sulfuric acid mist using EPA Method 8 of 40 CFR 60 Appendix A shall be conducted on an annual basis. [District Rule 2520, 9.3.2 and District Rule 4201] Federally Enforceable Through Title V Permit
28. A violation of emission standards of this permit, as shown by the stack-monitoring system, shall be reported to the district within 96 hours. [District Rule 1080, 9.0] Federally Enforceable Through Title V Permit
29. The operator shall notify the district at least 24 hours prior to the shutting down of monitoring equipment. In the event of breakdown of monitoring equipment, the owner or the operator shall notify the district within one hour after the breakdown is detected. [District Rules 1080, 10.0 and 1100, 6.1] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

30. The continuous SO2 monitor shall meet the applicable performance specification requirements in 40 CFR Part 51, Appendix P, and Part 60, Appendix B or shall meet equivalent specifications established by mutual agreement of District, CARB, and the EPA. [District Rule 1080, 6.5] Federally Enforceable Through Title V Permit

31. Visible emissions shall be inspected weekly during operation. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

32. The facility shall visually inspect for sulfur compound leaks at the sulfuric acid plant ducting and equipment each work shift when the plant is operating. Daily records shall be maintained to verify that a leak inspection was performed during each work shift. [District Rule 4102]

33. All sulfur compound leaks at the sulfuric acid plant ducting or equipment shall be reported to the District within 24 hours of detection. All leaks shall be repaired within 24 hours of detection. If the sulfur compound leaks cannot be repaired within 24 hours of detection, the plant shall be shut down until the leaks are repaired. [District Rule 4102]

34. For each sulfur compound leak occurrence, maintain a record indicating the following: (a). Date and time when the sulfur compound leak occurred; (b). Description (i.e. shape, size, type of leak, etc.) and location (relative to the nearest ductwork or equipment) of the sulfur compound leak; (c). Length of time to repair the sulfur compound leak (in minutes or hours); (d). The quantity of sulfur compound emissions from the leak (in pounds per hour); (e). The total quantity of plant sulfur compound emissions (in pounds per day) indicating whether excess emissions occurred due to the leak. [District Rule 4102]

35. The permittee shall maintain a daily record of the quantity of sulfuric acid produced in tons. [District Rules 1070 and 2201]

36. The permittee shall maintain a rolling 12-consecutive month total of the quantity of fuel heat input to the Sur-Lite Corp. furnace igniter burner (in MMBtu) and shall update the rolling total at least once each month. The fuel heat input can be calculated by multiplying the amount of natural gas fuel combusted (in scf) by a heating value of 1,000 Btu/scf. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit

37. Permittee shall maintain a rolling 12-consecutive month total of the quantity of oxides of sulfur emissions (as SO2 in pounds) from the entire sulfuric acid plant (including fugitive sulfur compound leak emissions) and shall update the rolling total at least once each month. [District Rules 1070 and 2201]

38. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit

Newspaper notice for publication in Stockton Record and for posting on valleyair.org

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NOTICE OF PRELIMINARY DECISION FOR THE PROPOSED ISSUANCE OF EMISSION REDUCTION CREDITS

NOTICE IS HEREBY GIVEN that the San Joaquin Valley Unified Air Pollution Control District solicits public comment on the proposed issuance of Emission Reduction Credits to J R Simplot Company for the replacement of the catalysts in the converters serving the sulfuric acid plant, at 16777 S. Howland Road in Lathrop, CA. The quantity of ERCs proposed for banking is 113,227 lb-SOx/year.

The analysis of the regulatory basis for this proposed action, Project #N-1131840, is available for public inspection at http://www.valleyair.org/notices/public_notices_idx.htm and at any District office. For additional information, please contact the District at (209) 557-6400. Written comments on this project must be submitted by January 5, 2015 to **ARNAUD MARJOLLET, DIRECTOR OF PERMIT SERVICES, SAN JOAQUIN VALLEY UNIFIED AIR POLLUTION CONTROL DISTRICT, 4800 ENTERPRISE WAY, MODESTO, CA 95356.**

Aviso en Español for posting on Valleyair.org

AVISO DE DECISIÓN PRELIMINAR PARA LA PROPUESTA OTORGACIÓN DE CERTIFICADOS DE REDUCCIÓN DE EMISIONES

POR EL PRESENTE SE NOTIFICA que el Distrito Unificado para el Control de la Contaminación del Aire del Valle de San Joaquín está solicitando comentarios del público para la propuesta emisión de Certificados de Reducción de Emisiones (ERC, por sus siglas en inglés) a J R Simplot Company para el reemplazo de los catalizadores en los convertidores apoderando la planta de producción de ácido sulfúrico en 16777 S. Howland Road en Lathrop, CA. La cantidad de ERCs propuestas para almacenar es 113,227 lb-SOx/año.

El análisis de la base regulatoria para esta acción propuesta, Proyecto #N-1131840, está disponible para la inspección pública en http://www.valleyair.org/notices/public_notices_idx.htm y en cualquiera de las oficinas del Distrito. Para más información en Español, por favor comuníquese con el Distrito al (209) 557-6400. Comentarios por escrito acerca de este propuesto permiso inicial deben de ser sometidos antes del 5 de Enero del 2015 a **ARNAUD MARJOLLET, DIRECTOR DEL DEPARTAMENTO DE PERMISOS, SAN JOAQUIN VALLEY UNIFIED AIR POLLUTION CONTROL DISTRICT, 4800 ENTERPRISE WAY, MODESTO, CA 95356.**

NOTICE OF PRELIMINARY DECISION FOR THE PROPOSED ISSUANCE OF EMISSION REDUCTION CREDITS

NOTICE IS HEREBY GIVEN that the San Joaquin Valley Unified Air Pollution Control District solicits public comment on the proposed issuance of Emission Reduction Credits to J R Simplot Company for the replacement of the catalysts in the converters serving the sulfuric acid plant, at 16777 S. Howland Road in Lathrop, CA. The quantity of ERCs proposed for banking is 113,227 lb-SOx/year.

The analysis of the regulatory basis for this proposed action, Project #N-1131840, is available for public inspection at http://www.valleyair.org/notices/public_notices_idx.htm and at any District office. For additional information, please contact the District at (209) 557-6400. Written comments on this project must be submitted by January 5, 2015 to **ARNAUD MARJOLLET, DIRECTOR OF PERMIT SERVICES, SAN JOAQUIN VALLEY UNIFIED AIR POLLUTION CONTROL DISTRICT, 4800 ENTERPRISE WAY, MODESTO, CA 95356.**

N-767
N-1131840

$134.96
Chan

THE RECORD
PROOF OF PUBLICATION

STATE OF CALIFORNIA
COUNTY OF SAN JOAQUIN

THE UNDERSIGNED SAYS:

I am a citizen of the United States and a resident of San Joaquin County; I am over the age of 18 years and not a part to or interested in the above-entitled matter. I am the principal clerk of the printer of THE RECORD, a newspaper of general publication, printed and published daily in the City of Stockton, County of San Joaquin by the Superior Court of the County of San Joaquin, State of California, under the date of February 26, 1952, File No. 52857, San Joaquin County Records; that the notice of which the annexed is a printed copy (set in type not smaller than nonpareil), has been published each regular and entire issue of said newspaper and not in any supplement thereof on the following dates,
To wit, December 5 2014

I declare under penalty of perjury that the foregoing is true and correct. Executed on December 5, 2014 In Stockton California

Carlette Schnell
Carlette Schnell,
The Record

0001023822

NOTICE OF PRELIMINARY DECISION
FOR THE PROPOSED ISSUANCE OF EMISSION REDUCTION CREDITS

NOTICE IS HEREBY GIVEN that the San Joaquin Valley Unified Air Pollution Control District solicits public comment on the proposed issuance of Emission Reduction Credits to J R Simplot Company for the replacement of the catalysts in the converters serving the sulfuric acid plant, at 16777 S. Howland Road in Lathrop, CA. The quantity of ERCs proposed for banking is 113,227 lb-SOx/year. The analysis of the regulatory basis for this proposed action, Project #N-1131840, is available for public inspection at http://www. valleyair.org/notices/public_notices_idx.htm and at any District office. For additional information, please contact the District at (209) 557-6400. Written comments on this project must be submitted by January 5, 2015 to **ARNAUD MARJOLLET, DIRECTOR OF PERMIT SERVICES, SAN JOAQUIN VALLEY UNIFIED AIR POLLUTION CONTROL DISTRICT, 4800 ENTERPRISE WAY, MODESTO, CA 95356.**
12/5/14
CNS-2694537#
THE RECORD #1023822

System ID# C2787963 Order# 29611605

PUBLIC NOTICE CHECK LIST

PROJECT #: N-767 PROJECT #: N-1131840

REQST.	COMPL.	
√	√	ERC PRELIMINARY PUBLIC NOTICE
√	☒	Newspaper Notice Emailed to Clerical (Check box and tab to generate Notice)
√	—	Send email to "OA-PublicNotices" containing the following: SUBJECT: facility name, facility id#, project #, type of notice (prelim/final) BODY: project description and why it is being noticed (Emission Reduction Credit Banking)

ENCLOSED DOCUMENTS REQUIRE:

√	√	Enter Correct Date, Print All Documents from File and Obtain Director's Signature
√	√	Determine date comment period will end, enter date on Newspaper Notice and Aviso en Español, and Email ***PRELIMINARY*** Newspaper Notice for Publication in Stockton Record Pub Date: 1-3-17 Due Date: 8-2-17
√	√	Mail/email ***PRELIMINARY*** Notice Letter to Applicant (email address: john.yanak@simplot.com and mike.fallon@simplot.com) with the following attachments: √ Application Evaluation √ Newspaper Notice
√	√	Email ***PRELIMINARY*** Public Notice package to EPA
√	√	Email ***PRELIMINARY*** Public Notice package to CARB
√	—	Email ***PRELIMINARY*** Newspaper Notice, Aviso en Español and Public Notice package to "~~webmaster~~" Webteam
√	—	After posted on website, send email with weblink of Newspaper notice, Aviso en Español, and full public notice package to: √ specific [C, S, or N] region **and** District wide permitting notification list-serves (both English and Spanish list serves) √ facility specific distribution list, (AQE – enter email address from PAS facility details notifications tab, if none enter NONE below): NONE
√	—	Mail the newspaper notice and aviso en español (NN/AE), or full public notice package (FPNP) to the persons on facility specific distribution list, as follows (entered by AQE, if none, enter NONE below): ☐NN/AE or ☐FPNP Name/address:NONE ☐NN/AE or ☐FPNP Name/address:NONE
√	—	Send ***PRELIMINARY*** Public Notice package to EDMS
—	—	Other Special Instructions (please specify):_____

Date Completed [DATE COMPLETED] /By Kai Chan

RECEIVED

DEC 29 2016

SJVAPCD

Tracker √
Proof √
Finance √
Webteam √
List Serve √

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Proof

Yolanda Sanchez
SAN JOAQUIN VALLEY AIR POLL CONTROL DIST
1990 E. GETTYSBURG AVE.
FRESNO, CA 93726

CNS 2961605

COPY OF NOTICE

Notice Type: GPN GOVT PUBLIC NOTICE

Ad Description: ERC Preliminary Public Notice, J R Simplot Company; N-1131840, Stockton

To the right is a copy of the notice you sent to us for publication in the THE RECORD. Please read this notice carefully and call us with any corrections. The Proof of Publication will be filed with the County Clerk, if required, and mailed to you after the last date below. Publication date(s) for this notice is (are):

01/03/2017

The charge(s) for this order is as follows. An invoice will be sent after the last date of publication. If you prepaid this order in full, you will not receive an invoice.

NOTICE OF PRELIMINARY DECISION FOR THE PROPOSED ISSUANCE OF EMISSION REDUCTION CREDITS

NOTICE IS HEREBY GIVEN that the San Joaquin Valley Unified Air Pollution Control District solicits public comment on the proposed issuance of Emission Reduction Credits to J R Simplot Company for the replacement of the catalysts in the converters serving the sulfuric acid plant, at 16777 S. Howland Road in Lathrop, CA. This project is being renoticed due to a USEPA Consent Decree (Case No. 1:15-cv-00562-CWD), which reduced the total bankable quantity of ERCs to 56,614 lb-SOx/year and restricted their use to only J R Simplot's facility in Lathrop, CA. The quantity of ERCs proposed for banking is 56,614 lb-SOx/yr.

The analysis of the regulatory basis for this proposed action, Project #N-1131840, is available for public inspection at http://www.valleyair.org/notices/public_notices_idx.htm and at any District office. For additional information, please contact the District at (209) 557-6400. Written comments on this project must be submitted by February 2, 2017 to **ARNAUD MARJOLLET, DIRECTOR OF PERMIT SERVICES, SAN JOAQUIN VALLEY UNIFIED AIR POLLUTION CONTROL DISTRICT, 4800 ENTERPRISE WAY, MODESTO, CA 95356.**
1/3/17
CNS-2961605#
THE RECORD

Yolanda Sanchez

From: Yolanda Sanchez
Sent: Thursday, December 29, 2016 1:53 PM
To: Gerardo Rios EPA (SJV_T5_Permits@epa.gov); Tung Le - CARB (ttle@arb.ca.gov)
Cc: john.yanak@simplot.com; 'mike.fallon@simplot.com'
Subject: ERC Preliminary Public Notice for J R Simplot Company; Facility: N-767, Project# N-1131840
Attachments: Preliminary N-1131840.pdf; Newspaper.pdf

Importance: High

NOTICE IS HEREBY GIVEN that the San Joaquin Valley Unified Air Pollution Control District solicits public comment on the proposed issuance of Emission Reduction Credits to J R Simplot Company for the replacement of the catalysts in the converters serving the sulfuric acid plant, at 16777 S. Howland Road in Lathrop, CA. This project is being renoticed due to a USEPA Consent Decree (Case No. 1:15-cv-00562-CWD), which reduced the total bankable quantity of ERCs to 56,614 lb-SOx/year and restricted their use to only J R Simplot's facility in Lathrop, CA. The quantity of ERCs proposed for banking is 56,614 lb-SOx/yr.

Thank you,

Yolanda Sanchez
Office Assistant II
SJVAPCD-Fresno 559-230-6000
yolanda.sanchez@valleyair.org

Yolanda Sanchez

From: postmaster@jrsweb.onmicrosoft.com
To: john.yanak@simplot.com
Sent: Thursday, December 29, 2016 1:53 PM
Subject: Delivered: ERC Preliminary Public Notice for J R Simplot Company; Facility: N-767, Project# N-1131840

Your message has been delivered to the following recipients:

john.yanak@simplot.com

Subject: ERC Preliminary Public Notice for J R Simplot Company; Facility: N-767, Project# N-1131840

Yolanda Sanchez

From: postmaster@jrsweb.onmicrosoft.com
To: 'mike.fallon@simplot.com'
Sent: Thursday, December 29, 2016 1:53 PM
Subject: Delivered: ERC Preliminary Public Notice for J R Simplot Company; Facility: N-767, Project# N-1131840

Your message has been delivered to the following recipients:

'mike.fallon@simplot.com' <mailto:mike.fallon@simplot.com>

Subject: ERC Preliminary Public Notice for J R Simplot Company; Facility: N-767, Project# N-1131840

Yolanda Sanchez

From: Microsoft Outlook
To: Gerardo Rios EPA (SJV_T5_Permits@epa.gov)
Sent: Thursday, December 29, 2016 1:53 PM
Subject: Relayed: ERC Preliminary Public Notice for J R Simplot Company; Facility: N-767, Project# N-1131840

Delivery to these recipients or groups is complete, but no delivery notification was sent by the destination server:

Gerardo Rios EPA (SJV_T5_Permits@epa.gov) (SJV_T5_Permits@epa.gov) <mailto:SJV_T5_Permits@epa.gov>

Subject: ERC Preliminary Public Notice for J R Simplot Company; Facility: N-767, Project# N-1131840

Yolanda Sanchez

From:	Yolanda Sanchez
Sent:	Thursday, December 29, 2016 1:59 PM
To:	WebTeam
Cc:	OA-PublicNotices; Yolanda Sanchez
Subject:	valleyair.org update: ERC Preliminary Public Notice for J R Simplot Company; Facility: N-767, Project# N-1131840
Attachments:	Preliminary N-1131840.pdf; Newspaper.pdf; Aviso.pdf
Importance:	High

December 29, 2016 (Facility N-767 Project N-1131840) NOTICE IS HEREBY GIVEN that the San Joaquin Valley Unified Air Pollution Control District solicits public comment on the proposed issuance of Emission Reduction Credits to J R Simplot Company for the replacement of the catalysts in the converters serving the sulfuric acid plant, at 16777 S. Howland Road in Lathrop, CA. This project is being renoticed due to a USEPA Consent Decree (Case No. 1:15-cv-00562-CWD), which reduced the total bankable quantity of ERCs to 56,614 lb-SOx/year and restricted their use to only J R Simplot's facility in Lathrop, CA. The quantity of ERCs proposed for banking is 56,614 lb-SOx/yr. The comment period ends on February 2, 2017.

Newspaper Notice

Aviso

Public Notice Package

Yolanda Sanchez
Office Assistant II
SJVAPCD-Fresno 559-230-6000
yolanda.sanchez@valleyair.org

Aviso en Español for posting on Valleyair.org

AVISO DE DECISIÓN PRELIMINAR PARA LA PROPUESTA OTORGACIÓN DE CERTIFICADOS DE REDUCCIÓN DE EMISIONES

POR EL PRESENTE SE NOTIFICA que el Distrito Unificado para el Control de la Contaminación del Aire del Valle de San Joaquín está solicitando comentarios del público para la propuesta emisión de Certificados de Reducción de Emisiones (ERC, por sus siglas en inglés) a J R Simplot Company para el reemplazo de los catalizadores en los convertidores apoderando la planta de ácido sulfúrico en 16777 S. Howland Road in Lathrop, CA. Este proyecto está siendo notificado otra vez debido a un Decreto del Consentimiento de USEPA (Caso Numero 1:15-cv-00562-CWD), cual redujo la cantidad total de ERCs almacenables a 56,614 lb-SOx/año y restringió su uso solamente a la facilidad de J R Simplot en Lathrop, CA. La cantidad de ERCs propuestas para almacenar es 56,614 lb-SOx/año.

El análisis de la base regulatoria para esta acción propuesta, Proyecto #N-1131840, está disponible para la inspección pública en http://www.valleyair.org/notices/public_notices_idx.htm y en cualquiera de las oficinas del Distrito. Para más información en Español, por favor comuníquese con el Distrito al (209) 557-6400. Comentarios por escrito acerca de este propuesto permiso inicial deben de ser sometidos antes del 2 de febrero del 2017 a **ARNAUD MARJOLLET, DIRECTOR DEL DEPARTAMENTO DE PERMISOS, SAN JOAQUIN VALLEY UNIFIED AIR POLLUTION CONTROL DISTRICT, 4800 ENTERPRISE WAY, MODESTO, CA 95356.**

NOTICE OF PRELIMINARY DECISION FOR THE PROPOSED ISSUANCE OF EMISSION REDUCTION CREDITS

NOTICE IS HEREBY GIVEN that the San Joaquin Valley Unified Air Pollution Control District solicits public comment on the proposed issuance of Emission Reduction Credits to J R Simplot Company for the replacement of the catalysts in the converters serving the sulfuric acid plant, at 16777 S. Howland Road in Lathrop, CA. This project is being renoticed due to a USEPA Consent Decree (Case No. 1:15-cv-00562-CWD), which reduced the total bankable quantity of ERCs to 56,614 lb-SOx/year and restricted their use to only J R Simplot's facility in Lathrop, CA. The quantity of ERCs proposed for banking is 56,614 lb-SOx/yr.

The analysis of the regulatory basis for this proposed action, Project #N-1131840, is available for public inspection at http://www.valleyair.org/notices/public_notices_idx.htm and at any District office. For additional information, please contact the District at (209) 557-6400. Written comments on this project must be submitted by February 2, 2017 to **ARNAUD MARJOLLET, DIRECTOR OF PERMIT SERVICES, SAN JOAQUIN VALLEY UNIFIED AIR POLLUTION CONTROL DISTRICT, 4800 ENTERPRISE WAY, MODESTO, CA 95356.**

See Thao

From: notices_of_permitting_actions-all_regions@lists.valleyair.org
Sent: Wednesday, January 4, 2017 5:02 PM
To: See Thao
Subject: Public Notice on Permitting Action N-1131840
Attachments: ATT00001.txt

The District has posted a new permitting public notice. The public notice can be viewed on our website at: http://www.valleyair.org/notices/Docs/2016/12-29-16_(N-1131840)/Newspaper.pdf

For a list of public notices and public notice packages, please visit our website at: http://www.valleyair.org/notices/public_notices_idx.htm#PermittingandEmissionReductionCreditCertificateNotices

Thank you,

See Thao
Senior Office Assistant
See.thao@valleyair.org

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See Thao

From: notices_of_permitting_actions-northern_region@lists.valleyair.org
Sent: Wednesday, January 4, 2017 5:02 PM
To: See Thao
Subject: Public Notice on Permitting Action N-1131840
Attachments: ATT00001.txt

The District has posted a new permitting public notice. The public notice can be viewed on our website at: http://www.valleyair.org/notices/Docs/2016/12-29-16_(N-1131840)/Newspaper.pdf

For a list of public notices and public notice packages, please visit our website at: http://www.valleyair.org/notices/public_notices_idx.htm#PermittingandEmissionReductionCreditCertificateNotices

Thank you,

See Thao
Senior Office Assistant
See.thao@valleyair.org

HEALTHY AIR LIVING
www.healthyairliving.com
Make one change for clean air!

See Thao

From:	avisos_sobre_acciones_de_permisos-todos-bounces@lists02.valleyair.org on behalf of avisos_sobre_acciones_de_permisos-todos@lists02.valleyair.org
Sent:	Wednesday, January 4, 2017 5:03 PM
To:	See Thao
Subject:	Aviso Publico Sobre Acciones de Permisos N-1131840
Attachments:	ATT00001.txt

El Distrito del Aire a publicado un nuevo aviso público de permiso. El aviso público se puede ver en nuestro sitio de web en: http://www.valleyair.org/notices/Docs/2016/12-29-16_(N-1131840)/Aviso.pdf

Para obtener una lista de avisos públicos y paquetes de avisos públicos, por favor visite nuestro sitio de web en:
http://www.valleyair.org/notices/public_notices_idx.htm#PermittingandEmissionReductionCreditCertificateNotices

Gracias,

See Thao
Senior Office Assistant
See.thao@valleyair.org

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San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT

HEALTHY AIR LIVING™

DEC 2 9 2016

John Yanak
J R Simplot Company
PO Box 198
Lathrop, CA 95330-0198

Re: Notice of Preliminary Decision – Emission Reduction Credits
Facility Number: N-767
Project Number: N-1131840

Dear Mr. Yanak:

Enclosed for your review and comment is the District's analysis of J R Simplot Company's application for Emission Reduction Credits (ERCs) resulting from the replacement of the catalysts in the converters serving the sulfuric acid plant, at 16777 S. Howland Road in Lathrop, CA. This project is being renoticed due to a USEPA Consent Decree (Case No. 1:15-cv-00562-CWD), which reduced the total bankable quantity of ERCs to 56,614 lb-SOx/year and restricted their use to only J R Simplot's facility in Lathrop, CA. The quantity of ERCs proposed for banking is 56,614 lb-SOx/yr.

The notice of preliminary decision for this project will be published approximately three days from the date of this letter. After addressing all comments made during the 30-day public notice comment period, the District intends to the issue the ERCs. Please submit your written comments on this project within the 30-day public comment period, as specified in the enclosed public notice.

Thank you for your cooperation in this matter. If you have any questions regarding this matter, please contact Mr. Kai Chan of Permit Services at (209) 557-6451.

Sincerely,

Arnaud Marjollet
Director of Permit Services

AM:kc

Enclosures

cc: Tung Le, CARB (w/enclosure) via email
cc: Gerardo C. Rios, EPA (w/enclosure) via email

Seyed Sadredin
Executive Director/Air Pollution Control Officer

Northern Region
4800 Enterprise Way
Modesto, CA 95356-8718
Tel: (209) 557-6400 FAX: (209) 557-6475

Central Region (Main Office)
1990 E. Gettysburg Avenue
Fresno, CA 93726-0244
Tel: (559) 230-6000 FAX: (559) 230-6061

Southern Region
34946 Flyover Court
Bakersfield, CA 93308-9725
Tel: 661-392-5500 FAX: 661-392-5585

www.valleyair.org www.healthyairliving.com

San Joaquin Valley Air Pollution Control District
Revised ERC Banking Application Review

Facility Name:	J R Simplot Company	Revision Date:	December 1, 2016
Mailing Address:	P.O. Box 198	Engineer:	Kai Chan
	Lathrop, CA 95330-0198	Lead Engineer:	Nick Peirce
Contact Person:	Michael Fallon		
Telephone:	(209) 858-6470		
Email:	Mike.Fallon@simplot.com		
Facility ID:	N-767		
Project #:	N-1131840		
Date Received:	May 28, 2013		
Deemed Complete:	June 5, 2014		

I. PROPOSAL:

J R Simplot Company is applying to bank Emission Reduction Credits (ERCs) resulting from the replacement of the catalysts in the two converters (R-301 and R-201) serving the sulfuric acid production plant and where appropriate high efficiency catalysts were utilized to improve the overall SO_2-to-SO_3 conversion efficiency. The use of the new catalysts resulted in a decrease in SO_2 emissions due to the improved SO_2-to-SO_3 conversion. Authority to Construct (ATC) permit N-767-9-15 authorizing the replacement of the catalysts (under Project #N-1131773) was issued on September 3, 2013. The sulfuric acid production plant is currently operating with the new high efficiency catalysts and lower SO_2 emissions limit under District Permit to Operate (PTO) N-767-9-21, which is attached in Appendix C for reference.

The following table provides the summary of the initial bankable emission reductions on a quarterly basis.

Initial Bankable Emission Reductions (lb-SO_2/quarter)				
Pollutant	**1st Quarter**	**2nd Quarter**	**3rd Quarter**	**4th Quarter**
SOx (as SO_2)	20,450	37,084	33,600	22,137

During the preliminary notice period of this ERC banking project on December 19, 2014, the USEPA submitted comments stating that these ERCs may not be "surplus" due to a Notice of Violation (NOV) issued to the facility for alleged violations of the Prevention of Significant Deterioration (PSD) requirements of the Federal Clean Air Act. At which time the J.R. Simplot Company agreed to delay the issuance of the ERCs until the NOV was resolved. In December 2015, the J.R. Simplot Company entered into a Consent Decree (Case No. 1:15-cv-00562-CWD) with the USEPA and the District to settle alleged Clean Air Act (CAA) violations at this facility. To satisfy the emission credit generation requirements, as outlined in Paragraphs 31, 32, and 33 of the Consent Decree (CD), the total bankable emission

reductions were reduced to 56,614 lb-SO_2/year. The following table provides the summary of the final bankable emission reductions on a quarterly basis.

Final Bankable Emission Reductions					
Pollutant	**Total (lb/year)**	**1st Quarter (lb/quarter)**	**2nd Quarter (lb/quarter)**	**3rd Quarter (lb/quarter)**	**4th Quarter (lb/quarter)**
SOx (as SO_2)	56,614	10,191	18,116	16,984	11,323

Per the CD, the following requirements will apply to the use of these ERCs:

- *These ERCs may only be used for emission offset purposes at the J R Simplot Company facility located at 16777 Howland Road in Lathrop, CA (Facility N-767).*

II. APPLICABLE RULES:

District Rule 2201: New and Modified Stationary Source Review (04/21/11)
District Rule 2301: Emission Reduction Credit Banking (01/19/12)

III. LOCATION OF REDUCTIONS:

The facility is located at 16777 Howland Road in Lathrop, California.

IV. METHOD OF GENERATING REDUCTIONS:

JR Simplot Company operates a sulfuric acid plant that manufactures sulfuric acid via a double-contact and double absorption process. To produce sulfuric acid, molten elemental sulfur is burned in a furnace to produce an SO_2 rich gas stream. After being passed through a heat recovery boiler to remove heat from the gas stream, the SO_2 is passed through a two-pass four-bed catalytic converter (R-301) where it reacts with oxygen to form SO_3. After the first converter, the now SO_3 rich gas stream is cooled and sent to an intermediate absorbing tower where much of the SO_3 is absorbed into a concentrated sulfuric acid solution. The exhaust gas from the intermediate absorbing tower is reheated and routed to a second multi-pass four-bed catalytic converter (R-201) where most of the remaining SO_2 is converted to SO_3. The gas stream exists the second converter, is cooled by heat recovery boilers, and is then routed to the final absorbing tower where virtually all of the remaining gas-phase SO_3 is absorbed into a concentrated sulfuric acid solution. The produced sulfuric acid is pumped into storage tanks.

The operation will emit SO_2 from the manufacturing process and is controlled with the existing mist eliminators on the absorption towers. The applicant did not make any changes to the existing control equipment. However, the applicant is proposing to use high efficiency catalysts in the existing converters, which will reduce SO_2 emissions by converting a higher quantity of SO_2 into SO_3 during the sulfuric acid manufacturing process.

V. EMISSIONS CALCULATIONS:

A. Assumptions:

1. SOx (as SO_2), sulfuric acid mist, PM_{10} (sulfuric acid mist emissions with an aerodynamic diameter less than 10 microns), and NOx will be emitted by the sulfuric acid manufacturing process. However, SO_2 emission reductions will only be generated due to the use of the high efficiency catalysts in the existing converters due to the improved SO_2-to-SO_3 conversion process.

2. Other assumptions will be stated as they are made.

B. Emission Factors (EF):

1. Pre-Modification SO_2 Emission Factors (EF1):

   The sulfuric acid production plant exhaust stack is equipped with continuous emissions monitors (CEMS) to measure SO_2 emissions. CEMS data is considered to be the best data available to estimate the emissions per District Policy APR-1110 (4/29/04). This data will be used to estimate the actual emissions for the purpose of this project.

2. Post-Modification SO_2 Emission Factors (EF2):

   The post-modification SO_2 emission factor is based on the applicant's proposed SOx emission limits and emission rates as indicated in the table below. These emission limits were verified by a source test conducted on Dec. 5, 2013.

Post-Modification Emission Factors for Permit N-767-9-16	
Pollutant	**EF2 and PE2**
$SOx_{Acid\ Plant}$ (EF2)	2.5 lb-SO_2/ton of 100% sulfuric acid produced[1]
$SOx_{Acid\ Plant}$ (Daily PE2)	1,750 lb-SO_2/day
$SOx_{Acid\ Plant}$ (Annual PE2)	410,296 lb-SO_2/year

C. Baseline Period:

Section 3.8 of District Rule 2201 defines the baseline period as a period of time equal to either the two consecutive years of operation immediately prior to the submission date of the complete application; or at least two consecutive years within the five years immediately prior to the submission of the complete application if it is more representative of normal source operations.

[1] Based on a proposed SOx emission rate of 1,750.0 lb/day and producing 700 tons/day of sulfuric acid, EF2 is equal to 2.5 lb-SO2/ton.

The Authority to Construct (ATC) permit application authorizing the use of the high efficiency catalysts, as processed under District Project #N-1131773, was received on May 28, 2013. ERC's are issued on a quarterly basis and the District will consider only full calendar quarters in the Baseline Period analysis. For this project the previous full calendar quarter is the first quarter of 2013. Therefore, the two consecutive years immediately prior to the submission date of the complete application is from April 1, 2011 to March 31, 2013 and will be the baseline period for this project.

D. Historical Actual Emissions:

Historical Actual Emissions (HAEs) are emissions that actually occurred, and are calculated from actual production records and established emission factors per Rule 2201, Section 6.2.1.

During CEMS data review, it is ensured that none of the readings is in excess of the permitted limits, and if there is any, it is corrected to the permitted limit. SO_2 emissions are summarized in the following table. The raw and corrected CEMS data is provided in Appendix B of this document.

HAE					
Year	**Q1 (lb-SO_2/qtr)**	**Q2 (lb-SO_2/qtr)**	**Q3 (lb-SO_2/qtr)**	**Q4 (lb-SO_2/qtr)**	**Total Annual (lb-SO_2/year)**
2011	---	186,593	156,788	95,956	---
2012	105,135	164,475	161,290	113,609	---
2013	88,459	---	---	---	---
Average	**96,797**	**175,534**	**159,039**	**104,783**	**536,153**

E. Actual Emissions Reductions (AERs):

Per Rule 2201, Section 4.12:

AER = HAE – Post Project Potential to Emit (PE2)

J R Simplot Company is not a seasonal source as defined in District Rule 2201, Section 3.37. The quarterly PE2 will be calculated based on the percentage of the annual actual emissions ($HAE_{Total\ Annual}$) occurring in each quarter during the baseline period calculated as follows:

Quarterly Operating Percentage = ($HAE_{Quarterly\ Emissions}$ ÷ $HAE_{Total\ Annual\ Emissions}$) × 100%
= ($HAE_{Quarterly\ Emissions}$ ÷ 536,153 lb-SO_2/year) × 100%

Quarterly PE2 (lb-SO_2/quarter) = Annual PE2 (lb-SO_2/year)
× Quarterly Operating Percentage
= 410,296 lb-SO_2/year
× Quarterly Operating Percentage

Quarter	HAE (lb-SO_2/quarter)	Quarterly Operating Percentage (%)	PE2 (lb-SO_2/quarter)
1	96,797	18.0540	74,075
2	175,534	32.7395	134,329
3	159,039	29.6630	121,706
4	104,783	19.5435	80,186

AER (lb-SO_2/quarter) = HAE (lb-SO_2/quarter) – PE2 (lb-SO_2/quarter)

AER			
Quarter	HAE (lb-SO_2/quarter)	PE2 (lb-SO_2/quarter)	AER (lb-SO_2/quarter)
1	96,797	74,075	22,722
2	175,534	134,329	41,205
3	159,039	121,706	37,333
4	104,783	80,186	24,597

F. Air Quality Improvement Reduction:

The air quality improvement deduction, per Rule 2201, Section 4.12.1, is 10% of the AERs. Therefore, the Air Quality Improvement Deduction will be calculated utilizing the following formula:

Air Quality Improvement Deduction = AER × 0.10

Air Quality Improvement Deduction		
Quarter	AER (lb-SO_2/quarter)	10% Deduction (lb-SO_2/quarter)
1	22,722	2,272
2	41,205	4,121
3	37,333	3,733
4	24,597	2,460

G. Increases in Permitted Emissions:

There is no increase in permitted emissions due to this project.

H. Bankable Emission Reductions:

The bankable ERCs presented below are determined by subtraction of the Air Quality Improvement Deductions from the AERs. Therefore:

Bankable Emission Reductions = AER – Air Quality Improvement Deductions

Bankable Emission Reductions			
Quarter	AER ($lb\text{-}SO_2$/quarter)	Air Quality Improvement Deductions ($lb\text{-}SO_2$/quarter)	Bankable Emission Reductions ($lb\text{-}SO_2$/quarter)
1	22,722	2,272	20,450
2	41,205	4,121	37,084
3	37,333	3,733	33,600
4	24,597	2,460	22,137

VI. COMPLIANCE:

To comply with the definition of Actual Emission Reductions (Rule 2201, Section 3.2.1 and Rule 2301, Sections 3.6 and 4.2.1), the reductions must be:

A. Real:

The emission reductions were generated by the replacement of the catalysts in the converters serving the sulfuric acid production plant with high efficiency catalysts, which resulted in a decrease in SO_2 emissions due to the improved SO_2-to-SO_3 conversion. If the replacement of the catalysts had not been done the emission reductions could not have otherwise occurred as authorized under ATC permit N-767-9-15. On December 5, 2013 a source test was conducted at the facility on the exhaust stack of the sulfuric acid plant. The results of the source test indicated a maximum SOx emission rate of 0.9 $lb\text{-}SO_2$/ton of sulfuric acid produced and 351 $lb\text{-}SO_2$/day, which verified compliance with the current SOx emission limits of 2.5 $lb\text{-}SO_2$/ton of sulfuric acid produced and 1,750 $lb\text{-}SO_2$/day, respectively. In addition, recent review of their quarterly CEMs data from the sulfuric acid plant also verified compliance with these SOx emission limits. The District is satisfied that emissions in the amounts calculated did indeed occur. Therefore, the emission reductions are real.

B. Enforceable:

The reductions are enforceable since ATC permit N-767-9-15 to implement the replacement of the catalysts has been converted into PTO N-767-9-16. The resulting lower SOx emissions limit of 2.5 $lb\text{-}SO_2$/ton of sulfuric acid produced at a sulfuric acid production rate limit of 700 tons/day are required by the conditions on the PTO and compliance with this limit was verified by a source test conducted at the sulfuric acid plant on December 5, 2013. Continued compliance with these limits will be verified by the required annual source testing and CEM system. In addition, the SOx emission limits are performance based limitations in pounds per ton of sulfuric acid produced, pounds of emissions per day, and pounds of emissions per year. The Permit to Operate and subsequent Permits to Operate for this sulfuric acid plant will maintain the performance based limitations for SOx. The conditions will include language stating that this condition is to enforce emission reductions of this project. This addition will ensure enforceability of the emission reduction credits for all future actions pertaining to this Permit to Operate (PTO N-767-9-16 is attached in Appendix C). Therefore, the reductions are enforceable.

C. Quantifiable:

The reductions were calculated utilizing the facilities historic CEMs data and methodologies consistent with District Rule 2201. Therefore the reductions are quantifiable.

D. Permanent:

The equipment description of the PTO lists the required emission control equipment, SOx emission limits are present on the permit, annual source testing and a CEM system is required to verify compliance with the SOx emission limits. Therefore, the reductions are permanent.

E. Surplus:

The applicant is proposing ERC's for SOx emissions from a sulfuric acid production plant. To determine whether or not reductions are surplus, the District must examine its current and proposed rules as well as requirements projected to apply to operations for which ERC's are proposed. The District also considers other District's rules during a surplus emission analysis. After examining all current, pending and projected regulations, the District will discount the emission factors to the level of the most stringent rule. And finally, discounting for any baseline period emission limit violations will also be performed. During this analysis, rules from the following agencies will be considered:

United States Environmental Protection Agency (USEPA)
California Air Resources Board (CARB)
San Joaquin Valley Air Pollution Control District (SJVAPCD)
South Coast Air Quality Management District (SCAQMD)
Bay Area Air Quality Management District (BAAQMD)
Sacramento Metropolitan Air Quality Management District (SMAQMD)

Below are the rules that will be considered:

Agency	Sulfur Compound Rules
USEPA	40 CFR Part 60, Subpart H
CARB	No Applicable Rules
SJVAPCD	4801
SCAQMD	469
BAAQMD	Regulation 9, Rule 1
SMAQMD	406, Section 301

Sulfur Compound Rules:

40 CFR Part 60, Subpart H – Standards of Performance for Sulfuric Acid Plants

§60.82(a) of this rule limits sulfur dioxide (SO_2) emissions to not exceed 4 lb/ton (2 kg/metric ton) expressed as 100 percent H_2SO_4. The historical actual emissions used in this project were based on facility CEMS data that complies with the permitted limit

of 4 lb/ton. Therefore, the proposed bankable emission reductions are surplus of this USEPA Regulation.

SJVAPCD Rule 4801 – Sulfur Compounds

Section 3.1 of this rule states that a person shall not discharge into the atmosphere sulfur compounds, which would exist as a liquid or gas at standard conditions, exceeding in concentration at the point of discharge: 0.2 % by volume (or 2,000 ppmv) calculated as SO_2, on a dry basis averaged over 15 consecutive minutes.

The HAE was calculated based on actual emissions with a sulfuric acid production plant potential to emit limit of 2,461 lb-SOx/day, 102.5 lb-SOx/hour, or 1.71 lb-SOx/min (based on operating 24 hr/day or 1,440 min/day). Therefore, the volume of SO_2 can be calculated using the following formula based on the ideal gas equation with an exhaust flow rate of 21,602 dscf/min:

$$\frac{1.71\ \text{lb} - \text{SOx}}{\text{Min}} \times \frac{\text{Min}}{21{,}602\ \text{dscf}} \times \frac{\text{lb} \cdot \text{mol}}{64\ \text{lb}} \times \frac{379.5 \cdot \text{ft}^3}{\text{lb} \cdot \text{mol}} \times \frac{1{,}000{,}000 \cdot \text{parts}}{\text{million}} = 469.4 \frac{\text{parts}}{\text{million}}$$

SO_2 Concentration = 469.4 ppmv < 2,000 ppmv (or 0.2%)

Therefore, the proposed bankable emission reduction credits are surplus of District Rule 4801 requirements.

SCAQMD Rule 469 – Sulfuric Acid Units

Section (a) of this rule states that a person shall not discharge into the atmosphere form any sulfuric acid unit, effluent process gas containing more than: (1) 500 ppm of sulfur compounds expressed as SO_2, calculated on a dry basis averaged over a minimum of 15 consecutive minutes.; (2) 90 kilograms (198.5 pounds) per hour of sulfur compounds expressed as SO_2.

As determined above, HAE was calculated based on a maximum SO_2 concentration of 469.5 ppmv and a maximum emission rate of 102.5 lb/hour, which is less than these rule requirements. Therefore, the proposed bankable emission reduction credits are surplus of SCAQMD Rule 469 requirements.

BAAQMD Regulation 9 - Inorganic Gaseous Pollutions, Rule 1 - Sulfur Dioxide

Section 9-1-309 of this rule states that a person shall not emit, from any source in a sulfuric acid plant, effluent process gas containing sulfur dioxide in excess of 300 ppm by volume calculated at 12% oxygen. To determine if the HAE exceeds this regulation, this requirement will be converted to a lb/hr value using the maximum exhaust flow rate for the sulfuric acid plant of 21,602 dscf/min and the following equation:

$$\frac{300\ \text{ppmv}}{10^6} \times \frac{64\ \text{lb}}{\text{lb mol}} \times \frac{\text{lb} \cdot \text{mol}}{379.5\ \text{ft}^3} \times \frac{21{,}602\ \text{dscf}}{\text{min}} \times \frac{60\ \text{min}}{\text{hour}} \times \frac{20.95}{(20.95 - 12.0)} = 153.5 \frac{\text{lb} - \text{SO}_2}{\text{hour}}$$

As determined above, the HAE was calculated based on a maximum SO_2 emission rate of 102.5 lb/hour, which is less than this rule requirement. Therefore, the proposed bankable emission reduction credits are surplus of BAAQMD Regulation 9, Rule 1 requirements.

SMAQMD Rule 406 - Specific Contaminants, Section 300 – Standards

Section 301 of this rules states that a person shall not discharge into the atmosphere from any single source of emission whatsoever sulfur compounds in any state or combination thereof exceeding in concentration at the point of discharge: sulfur compounds, calculated as sulfur dioxide (SO_2): 0.2% by volume (2,000 ppmv) except as otherwise provided in Rule 420.

As determined above, the HAE was calculated based on a maximum SO_2 concentration of 469.5 ppmv, which is less than this rule requirement. Therefore, the proposed bankable emission reduction credits are surplus of SMAQMD Rule 406, Section 300 requirements.

F. Not used for the approval of an Authority to Construct or as Offsets:

The ERCs generated by the replacement of the catalysts in the two converters (R-301 and R-201) serving the sulfuric acid production plant were not used for the approval of any Authority to Construct or as offsets.

G. Timely Submittal:

Section 5.5 of Rule 2301 states that ERC certificate applications for reductions shall be submitted within 180 days after modification and startup (date of permanent emission reductions) of the emissions unit. The modification and equipment startup occurred on October 14, 2013, and the ERC application was received on May 28, 2013. Therefore, the application was submitted in a timely fashion since the application was received prior to 180 days of the modified equipment startup date.

VII. RECOMMENDATION:

The District recommends that an ERC Certificate be issued to J R Simplot Company for the amount indicated in the following table as limited by USEPA Consent Decree (Case No. 1:15-cv-00562-CWD).

Final Bankable Emission Reductions in lb/quarter				
Pollutant	**1st Quarter**	**2nd Quarter**	**3rd Quarter**	**4th Quarter**
SOx (as SO_2)	10,191	18,116	16,984	11,323

Per the Consent Decree, the following requirements will apply to the use of these ERCs:

- *These ERCs may only be used for emission offset purposes at the J R Simplot Company facility located at 16777 Howland Road in Lathrop, CA (Facility N-767).*

APPENDICES:

Appendix A Draft ERC Certificate
Appendix B Copy of the Raw and Corrected CEM Data for HAE Calculations
Appendix C Permit to Operate N-767-9-21

Appendix A

Draft ERC Certificate

San Joaquin Valley
Air Pollution Control District

Northern Regional Office • 4800 Enterprise Way • Modesto, CA 95356-8718

Emission Reduction Credit Certificate

DRAFT

N-1250-5

ISSUED TO: J R SIMPLOT COMPANY

ISSUED DATE: <DRAFT>

LOCATION OF REDUCTION: 16777 S. HOWLAND ROAD
LATHROP, CA 95330

For SOx Reductions In The Amount Of:

Quarter 1	Quarter 2	Quarter 3	Quarter 4
10,191 lbs	18,116 lbs	16,984 lbs	11,323 lbs

Method Of Reduction

[ ] Shutdown of Entire Stationary Source
[ ] Shutdown of Emissions Units
[X] Other

Replacement of catalyst in the sulfuric acid plant converters that improved SO2 to SO3 conversion and reduced SO2 emissions (ATC N-767-9-15). THE ERCs MAY ONLY BE USED FOR EMISSION OFFSET PURPOSES AT 16777 S. HOWLAND ROAD IN LATHROP, CA (FACILITY N-767).

Use of these credits outside the San Joaquin Valley Unified Air Pollution Control District (SJVUAPCD) is not allowed without express written authorization by the SJVUAPCD.

Seyed Sadredin, Executive Director / APCO

DRAFT

Arnaud Marjollet, Director of Permit Services

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Appendix B

Copy of the Raw and Corrected CEM Data for HAE Calculations

Monthly Summaries

Date	Adjusted SO2 Emissions (lbs)	100% H2SO4 Production (tons)	24-M Avg SO2 (T/yr)	H2SO4 EF (lb/T)	H2SO4 Emissions (T)	24-M Avg H2SO4 (T/yr)	24-M Avg Production (T/yr)
Apr-2011	49,671	16,448	262	0.093	0.76	8.35	175,733
May-2011	69,004	20,342	264	0.093	0.95	8.35	176,717
Jun-2011	67,918	19,602	271	0.093	0.91	8.44	179,574
Jul-2011	64,293	20,190	280	0.093	0.94	8.51	181,894
Aug-2011	50,454	15,595	277	0.093	0.73	8.39	180,479
Sep-2011	42,041	12,957	277	0.093	0.60	8.39	181,208
Oct-2011	7,616	4,371	273	0.093	0.20	8.30	179,534
Nov-2011	48,418	17,340	274	0.093	0.81	8.31	180,790
Dec-2011	39,922	13,907	274	0.093	0.65	8.30	181,305
Jan-2012	33,895	11,340	275	0.154	0.87	8.49	181,382
Feb-2012	30,292	10,331	272	0.154	0.80	8.59	179,977
Mar-2012	40,948	13,616	269	0.154	1.05	8.75	178,696
Apr-2012	50,762	16,830	271	0.154	1.30	9.10	180,509
May-2012	60,233	19,323	272	0.154	1.49	9.46	181,647
Jun-2012	53,480	16,513	273	0.154	1.27	9.71	181,293
Jul-2012	69,946	20,429	279	0.154	1.57	10.13	183,324
Aug-2012	51,850	15,473	283	0.154	1.19	10.41	184,207
Sep-2012	39,494	11,777	278	0.154	0.91	10.46	180,990
Oct-2012	22,579	7,890	280	0.154	0.61	10.66	182,681
Nov-2012	56,587	16,212	287	0.154	1.25	11.02	184,922
Dec-2012	34,443	12,434	281	0.154	0.96	11.06	181,445
Jan-2013	28,353	10,428	277	0.154	0.80	11.07	178,266
Feb-2013	29,606	12,574	274	0.154	0.97	11.19	176,709
Mar-2013	30,500	13,941	268	0.154	1.07	11.32	174,932

Adjusted Daily Values

Date	Raw 15-min SO2 Avg	Adj. 15-min SO2 Avg	Raw 3-hr SO2 Avg	Adj. 3-hr SO2 Avg	Raw ppmv SO2 Avg	Adj. ppmv SO2 Avg	Raw Daily Rate (SO2 lb/day)	Adj. Daily Rate (SO2 lb/day)	Final Daily Rate (SO2 lb/day)
04/01/2011	3.04	3.04	3.04	3.04	272	272	1,377	1,377	1,377
04/02/2011	3.03	3.03	3.03	3.03	274	274	1,404	1,404	1,404
04/03/2011	3.10	3.10	3.09	3.09	284	284	1,443	1,443	1,443
04/04/2011	3.19	3.19	3.18	3.18	294	294	1,466	1,466	1,466
04/05/2011	2.98	3.01	2.98	2.98	274	274	1,511	1,511	1,511
04/06/2011	3.05	3.05	3.06	3.06	279	279	1,469	1,469	1,469
04/07/2011	2.95	2.95	2.95	2.95	266	266	1,457	1,457	1,457
04/08/2011	3.00	3.00	2.99	2.99	273	273	1,467	1,467	1,467
04/09/2011	2.96	2.96	2.97	2.97	266	266	1,557	1,557	1,557
04/10/2011	2.94	2.94	2.93	2.93	264	264	1,610	1,610	1,610
04/11/2011	3.11	3.11	3.09	3.09	284	284	1,663	1,663	1,663
04/12/2011	3.10	3.10	3.10	3.10	282	282	1,842	1,842	1,842
04/13/2011	3.04	3.04	3.04	3.04	274	274	1,861	1,861	1,861
04/14/2011	3.03	3.03	3.02	3.02	273	273	1,824	1,824	1,824
04/15/2011	3.11	3.11	3.11	3.11	283	283	1,817	1,817	1,817
04/16/2011	3.26	3.26	3.01	3.01	280	280	1,868	1,868	1,868
04/17/2011	3.25	3.25	3.25	3.25	296	296	1,265	1,265	1,265
04/18/2011	3.12	3.12	3.14	3.14	279	279	1,985	1,985	1,985
04/19/2011	3.41	3.41	3.41	3.41	313	313	1,419	1,419	1,419
04/20/2011	3.23	3.23	3.23	3.23	293	293	2,061	2,061	2,061
04/21/2011	3.13	3.13	3.11	3.11	279	279	1,956	1,956	1,956
04/22/2011	3.28	3.28	3.28	3.28	297	297	1,905	1,905	1,905
04/23/2011	3.29	3.29	3.29	3.29	298	298	2,024	2,024	2,024
04/24/2011	3.27	3.27	3.26	3.26	295	295	2,027	2,027	2,027
04/25/2011	3.29	3.29	3.28	3.28	298	298	1,988	1,988	1,988
04/26/2011	3.35	3.35	3.35	3.35	307	307	1,994	1,994	1,994
04/27/2011	3.30	3.30	3.30	3.30	301	301	2,031	2,031	2,031
04/28/2011	12.91	6.35	14.24	3.63	236	236	1,842	1,842	470
04/29/2011	3.38	3.38	3.37	3.37	310	310	862	862	862
04/30/2011	3.40	3.40	3.41	3.41	312	312	2,047	2,047	2,047
05/01/2011	3.27	3.27	3.26	3.26	299	299	2,081	2,081	2,081
05/02/2011	3.34	3.34	3.33	3.33	307	307	2,022	2,022	2,022
05/03/2011	3.32	3.33	3.32	3.31	292	293	2,129	2,124	2,124
05/04/2011	3.30	3.30	3.30	3.30	303	303	2,039	2,039	2,039
05/05/2011	3.25	3.25	3.27	3.27	296	296	2,121	2,121	2,121
05/06/2011	3.24	3.24	3.23	3.23	292	292	2,090	2,090	2,090
05/07/2011	3.37	3.37	3.37	3.37	307	307	2,093	2,093	2,093
05/08/2011	3.35	3.35	3.34	3.34	305	305	2,172	2,172	2,172
05/09/2011	3.36	3.36	3.35	3.35	305	305	2,155	2,155	2,155
05/10/2011	3.33	3.33	3.33	3.33	302	302	2,159	2,159	2,159
05/11/2011	3.38	3.38	3.38	3.38	308	308	2,139	2,139	2,139
05/12/2011	3.37	3.37	3.36	3.36	306	306	2,167	2,167	2,167
05/13/2011	3.39	3.39	3.38	3.38	309	309	2,224	2,224	2,224
05/14/2011	3.40	3.40	3.40	3.40	309	309	2,278	2,278	2,278
05/15/2011	3.43	3.43	3.43	3.43	310	310	2,288	2,288	2,288
05/16/2011	3.45	3.45	3.44	3.44	313	313	2,295	2,295	2,295
05/17/2011	3.51	3.51	3.51	3.51	320	320	2,312	2,312	2,312
05/18/2011	3.50	3.50	3.51	3.51	321	321	2,361	2,361	2,361
05/19/2011	3.43	3.43	3.43	3.43	313	313	2,348	2,348	2,348
05/20/2011	3.40	3.40	3.40	3.40	310	310	2,295	2,295	2,295
05/21/2011	3.40	3.40	3.40	3.40	309	309	2,272	2,272	2,272
05/22/2011	3.41	3.41	3.40	3.40	309	309	2,275	2,275	2,275
05/23/2011	3.45	3.45	3.44	3.44	313	313	2,277	2,277	2,277
05/24/2011	3.37	3.37	3.37	3.37	303	303	2,302	2,302	2,302
05/25/2011	3.41	3.41	3.40	3.40	308	308	2,266	2,266	2,266
05/26/2011	3.39	3.39	3.39	3.39	307	307	2,296	2,296	2,296
05/27/2011	3.43	3.43	3.43	3.43	313	313	2,278	2,278	2,278
05/28/2011	3.43	3.43	3.42	3.42	312	312	2,309	2,309	2,309
05/29/2011	3.46	3.46	3.46	3.46	315	315	2,311	2,311	2,311
05/30/2011	3.44	3.44	3.43	3.43	312	312	2,339	2,339	2,339
05/31/2011	3.41	3.41	3.41	3.41	308	308	2,314	2,314	2,314
06/01/2011	3.33	3.33	3.33	3.33	298	298	2,296	2,296	2,296

Adjusted Daily Values

Date	Raw 15-min SO2 Avg	Adj. 15-min SO2 Avg	Raw 3-hr SO2 Avg	Adj. 3-hr SO2 Avg	Raw ppmv SO2 Avg	Adj. ppmv SO2 Avg	Raw Daily Rate (SO2 lb/day)	Adj. Daily Rate (SO2 lb/day)	Final Daily Rate (SO2 lb/day)
06/02/2011	4.56	4.56	3.89	3.50	355	355	2,237	2,237	2,013
06/03/2011	3.36	3.36	3.35	3.35	302	302	1,366	1,366	1,366
06/04/2011	3.46	3.46	3.45	3.45	316	316	2,249	2,249	2,249
06/05/2011	3.35	3.35	3.35	3.35	303	303	2,342	2,342	2,342
06/06/2011	3.43	3.43	3.43	3.43	313	313	2,259	2,259	2,259
06/07/2011	3.22	3.27	3.30	3.30	301	301	2,311	2,311	2,311
06/08/2011	3.39	3.39	3.39	3.39	310	310	2,229	2,229	2,229
06/09/2011	3.42	3.42	3.43	3.43	312	312	2,289	2,289	2,289
06/10/2011	3.26	3.26	3.24	3.24	296	296	2,278	2,278	2,278
06/11/2011	3.47	3.47	3.46	3.46	317	317	2,124	2,124	2,124
06/12/2011	3.51	3.51	3.51	3.51	321	321	2,351	2,351	2,351
06/13/2011	3.45	3.45	3.45	3.45	314	314	2,372	2,372	2,372
06/14/2011	3.45	3.45	3.45	3.45	314	314	2,335	2,335	2,335
06/15/2011	3.37	3.37	3.37	3.37	306	306	2,338	2,338	2,338
06/16/2011	3.32	3.32	3.32	3.32	299	299	2,284	2,284	2,284
06/17/2011	3.36	3.36	3.35	3.35	303	303	2,267	2,267	2,267
06/18/2011	3.39	3.39	3.39	3.39	305	305	2,299	2,299	2,299
06/19/2011	3.37	3.37	3.37	3.37	304	304	2,307	2,307	2,307
06/20/2011	3.40	3.40	3.39	3.39	307	307	2,297	2,297	2,297
06/21/2011	3.43	3.43	3.44	3.44	311	311	2,307	2,307	2,307
06/22/2011	3.41	3.41	3.40	3.40	308	308	2,330	2,330	2,330
06/23/2011	3.42	3.42	3.42	3.42	308	308	2,316	2,316	2,316
06/24/2011	3.41	3.41	3.40	3.40	306	306	2,334	2,334	2,334
06/25/2011	3.43	3.43	3.42	3.42	308	308	2,324	2,324	2,324
06/26/2011	3.44	3.44	3.43	3.43	310	310	2,336	2,336	2,336
06/27/2011	3.44	3.44	3.44	3.44	310	310	2,338	2,338	2,338
06/28/2011	3.47	3.47	3.47	3.47	312	312	2,343	2,343	2,343
06/29/2011	3.41	3.41	3.40	3.40	305	305	2,360	2,360	2,360
06/30/2011	3.43	3.43	3.45	3.45	311	311	2,324	2,324	2,324
07/01/2011	3.35	3.35	3.35	3.35	305	305	2,341	2,341	2,341
07/02/2011	3.44	3.44	3.44	3.44	315	315	2,285	2,285	2,285
07/03/2011	3.38	3.38	3.38	3.38	307	307	2,345	2,345	2,345
07/04/2011	3.42	3.42	3.42	3.42	312	312	2,285	2,285	2,285
07/05/2011	3.37	3.37	3.36	3.36	308	308	2,325	2,325	2,325
07/06/2011	3.34	3.34	3.34	3.34	304	304	2,293	2,293	2,293
07/07/2011	3.40	3.40	3.40	3.40	310	310	2,269	2,269	2,269
07/08/2011	3.36	3.36	3.36	3.36	305	305	2,320	2,320	2,320
07/09/2011	3.35	3.35	3.35	3.35	303	303	2,276	2,276	2,276
07/10/2011	3.31	3.31	3.31	3.31	298	298	2,282	2,282	2,282
07/11/2011	3.40	3.40	3.39	3.39	302	302	2,253	2,253	2,253
07/12/2011	3.38	3.38	3.38	3.38	306	306	2,294	2,294	2,294
07/13/2011	3.42	3.42	3.42	3.42	309	309	2,317	2,317	2,317
07/14/2011	3.37	3.37	3.37	3.37	303	303	2,344	2,344	2,344
07/15/2011	3.38	3.38	3.38	3.38	306	306	2,304	2,304	2,304
07/16/2011	3.41	3.41	3.41	3.41	309	309	2,321	2,321	2,321
07/17/2011	3.38	3.38	3.38	3.38	307	307	2,333	2,333	2,333
07/18/2011	3.36	3.36	3.36	3.36	304	304	2,309	2,309	2,309
07/19/2011	3.32	3.32	3.32	3.32	301	301	2,289	2,289	2,289
07/20/2011	3.33	3.33	3.33	3.33	303	303	2,256	2,256	2,256
07/21/2011	3.32	3.32	3.32	3.32	305	305	2,262	2,262	2,262
07/22/2011	3.36	3.36	3.35	3.35	311	311	2,276	2,276	2,276
07/23/2011	74.35	5.77	72.23	3.38	541	456	0	0	0
07/24/2011	2.81	2.81	2.80	2.80	254	254	1,037	1,037	1,037
07/25/2011	2.77	2.77	2.77	2.77	251	251	1,847	1,847	1,847
07/26/2011	2.84	2.84	2.84	2.84	259	259	1,824	1,824	1,824
07/27/2011	2.79	2.79	2.79	2.79	254	254	1,902	1,902	1,902
07/28/2011	2.71	2.71	2.72	2.72	246	246	1,887	1,887	1,887
07/29/2011	2.58	2.58	2.58	2.58	233	233	1,835	1,835	1,835
07/30/2011	2.41	2.41	2.41	2.41	218	218	1,743	1,743	1,743
07/31/2011	2.21	2.21	2.23	2.23	202	202	1,634	1,634	1,634
08/01/2011	1.81	1.81	1.84	1.84	165	165	1,512	1,512	1,512
08/02/2011	2.59	2.62	2.48	2.48	241	241	1,233	1,233	1,233

Adjusted Daily Values

Date	Raw 15-min SO2 Avg	Adj. 15-min SO2 Avg	Raw 3-hr SO2 Avg	Adj. 3-hr SO2 Avg	Raw ppmv SO2 Avg	Adj. ppmv SO2 Avg	Raw Daily Rate (SO2 lb/day)	Adj. Daily Rate (SO2 lb/day)	Final Daily Rate (SO2 lb/day)
08/03/2011	3.45	3.45	3.45	3.45	309	309	1,819	1,819	1,819
08/04/2011	3.30	3.30	3.30	3.30	297	297	2,334	2,334	2,334
08/05/2011	3.45	3.45	3.46	3.46	311	311	2,253	2,253	2,253
08/06/2011	3.45	3.45	3.45	3.45	311	311	2,342	2,342	2,342
08/07/2011	3.42	3.42	3.42	3.42	307	307	2,349	2,349	2,349
08/08/2011	3.45	3.45	3.45	3.45	310	310	2,324	2,324	2,324
08/09/2011	3.58	3.58	3.39	3.34	314	314	2,334	2,334	2,297
08/10/2011	3.31	3.31	3.30	3.30	302	302	1,423	1,423	1,423
08/11/2011	3.29	3.29	3.29	3.29	299	299	2,160	2,160	2,160
08/12/2011	3.31	3.31	3.30	3.30	301	301	2,183	2,183	2,183
08/13/2011	3.21	3.21	3.22	3.22	291	291	2,191	2,191	2,191
08/14/2011	2.98	2.98	2.98	2.98	270	270	2,048	2,048	2,048
08/15/2011	2.95	2.95	2.95	2.95	267	267	1,409	1,409	1,409
08/16/2011	2.98	2.98	2.97	2.97	272	272	1,364	1,364	1,364
08/17/2011	3.08	3.08	3.09	3.09	284	284	1,383	1,383	1,383
08/18/2011	3.08	3.08	3.07	3.07	283	283	1,445	1,445	1,445
08/19/2011	3.02	3.02	3.01	3.01	276	276	1,373	1,373	1,373
08/20/2011	3.11	3.11	3.11	3.11	286	286	1,152	1,152	1,152
08/21/2011	3.07	3.07	3.08	3.08	280	280	1,179	1,179	1,179
08/22/2011	3.08	3.08	3.06	3.06	281	281	1,162	1,162	1,162
08/23/2011	3.14	3.14	3.15	3.15	288	288	1,157	1,157	1,157
08/24/2011	2.97	2.97	2.97	2.97	268	268	1,177	1,177	1,177
08/25/2011	3.04	3.04	3.03	3.03	280	280	1,171	1,171	1,171
08/26/2011	2.91	2.91	2.92	2.92	264	264	1,319	1,319	1,319
08/27/2011	2.91	2.91	2.90	2.90	263	263	1,280	1,280	1,280
08/28/2011	2.99	2.99	2.98	2.98	273	273	1,291	1,291	1,291
08/29/2011	2.97	2.97	2.98	2.98	271	271	1,341	1,341	1,341
08/30/2011	3.01	3.01	3.01	3.01	278	278	1,349	1,349	1,349
08/31/2011	2.98	2.98	2.98	2.98	272	272	1,437	1,437	1,437
09/01/2011	3.00	3.00	2.99	2.99	275	275	1,415	1,415	1,415
09/02/2011	3.00	3.00	3.00	3.00	277	277	1,420	1,420	1,420
09/03/2011	2.90	2.90	2.90	2.90	263	263	1,420	1,420	1,420
09/04/2011	2.88	2.88	2.88	2.88	261	261	1,317	1,317	1,317
09/05/2011	2.96	2.96	2.95	2.95	271	271	1,331	1,331	1,331
09/06/2011	2.88	2.88	2.96	2.95	256	256	1,380	1,380	1,375
09/07/2011	2.97	2.97	2.97	2.97	272	272	1,292	1,292	1,292
09/08/2011	3.01	3.01	3.00	3.00	274	274	1,496	1,496	1,496
09/09/2011	3.06	3.06	3.05	3.05	279	279	1,694	1,694	1,694
09/10/2011	3.10	3.10	3.10	3.10	281	281	1,755	1,755	1,755
09/11/2011	3.13	3.13	3.13	3.13	282	282	1,871	1,871	1,871
09/12/2011	3.16	3.16	3.15	3.15	285	285	1,915	1,915	1,915
09/13/2011	3.18	3.18	3.17	3.17	288	288	1,924	1,924	1,924
09/14/2011	3.10	3.10	3.10	3.10	281	281	1,936	1,936	1,936
09/15/2011	3.08	3.08	3.07	3.07	274	274	1,896	1,896	1,896
09/16/2011	3.24	3.24	3.23	3.23	291	291	1,950	1,950	1,950
09/17/2011	3.41	3.41	3.40	3.40	310	310	2,146	2,146	2,146
09/18/2011	3.40	3.40	3.40	3.40	309	309	2,317	2,317	2,317
09/19/2011	3.45	3.45	3.44	3.44	315	315	2,298	2,298	2,298
09/20/2011	3.41	3.41	3.40	3.40	311	311	2,336	2,336	2,336
09/21/2011	3.47	3.47	3.46	3.46	316	316	2,305	2,305	2,305
09/22/2011	3.41	3.41	3.41	3.41	310	310	2,341	2,341	2,341
09/23/2011	3.40	3.40	3.42	3.42	307	307	2,290	2,290	2,290
09/24/2011	0.00	0.00	0.00	0.00	0	0	0	0	0
09/25/2011	0.00	0.00	0.00	0.00	0	0	0	0	0
09/26/2011	0.00	0.00	0.00	0.00	0	0	0	0	0
09/27/2011	0.00	0.00	0.00	0.00	0	0	0	0	0
09/28/2011	0.00	0.00	0.00	0.00	0	0	0	0	0
09/29/2011	0.00	0.00	0.00	0.00	0	0	0	0	0
09/30/2011	0.00	0.00	0.00	0.00	0	0	0	0	0
10/01/2011	0.00	0.00	0.00	0.00	0	0	0	0	0
10/02/2011	0.00	0.00	0.00	0.00	0	0	0	0	0
10/03/2011	0.00	0.00	0.00	0.00	0	0	0	0	0

Adjusted Daily Values

Date	Raw 15-min SO2 Avg	Adj. 15-min SO2 Avg	Raw 3-hr SO2 Avg	Adj. 3-hr SO2 Avg	Raw ppmv SO2 Avg	Adj. ppmv SO2 Avg	Raw Daily Rate (SO2 lb/day)	Adj. Daily Rate (SO2 lb/day)	Final Daily Rate (SO2 lb/day)
10/04/2011	0.00	0.00	0.00	0.00	0	0	0	0	0
10/05/2011	0.00	0.00	0.00	0.00	0	0	0	0	0
10/06/2011	0.00	0.00	0.00	0.00	0	0	0	0	0
10/07/2011	0.00	0.00	0.00	0.00	0	0	0	0	0
10/08/2011	0.00	0.00	0.00	0.00	0	0	0	0	0
10/09/2011	0.00	0.00	0.00	0.00	0	0	0	0	0
10/10/2011	0.00	0.00	0.00	0.00	0	0	0	0	0
10/11/2011	0.00	0.00	0.00	0.00	0	0	0	0	0
10/12/2011	0.00	0.00	0.00	0.00	0	0	0	0	0
10/13/2011	0.00	0.00	0.00	0.00	0	0	0	0	0
10/14/2011	0.00	0.00	0.00	0.00	0	0	0	0	0
10/15/2011	0.00	0.00	0.00	0.00	0	0	0	0	0
10/16/2011	0.00	0.00	0.00	0.00	0	0	0	0	0
10/17/2011	0.00	0.00	0.00	0.00	0	0	0	0	0
10/18/2011	0.00	0.00	0.00	0.00	0	0	0	0	0
10/19/2011	0.00	0.00	0.00	0.00	0	0	0	0	0
10/20/2011	0.00	0.00	0.00	0.00	0	0	0	0	0
10/21/2011	0.00	0.00	0.00	0.00	0	0	0	0	0
10/22/2011	2.18	2.18	2.25	2.25	190	190	0	0	0
10/23/2011	5.78	3.28	5.82	2.27	171	171	563	563	220
10/24/2011	1.86	1.86	1.85	1.85	168	168	798	798	798
10/25/2011	1.87	1.87	1.88	1.88	168	168	868	868	868
10/26/2011	1.78	1.78	1.78	1.78	161	161	871	871	871
10/27/2011	1.62	1.62	1.64	1.64	146	146	869	869	869
10/28/2011	2.24	2.24	2.18	2.18	204	204	894	894	894
10/29/2011	5.33	3.08	5.32	2.65	235	235	1,454	1,454	724
10/30/2011	2.42	2.42	2.42	2.42	216	216	1,416	1,416	1,416
10/31/2011	4.52	3.28	2.42	2.42	214	214	1,318	1,318	955
11/01/2011	4.60	3.30	3.68	2.80	254	254	997	997	715
11/02/2011	2.44	2.44	2.45	2.45	219	219	1,464	1,464	1,464
11/03/2011	3.93	3.81	3.90	2.86	224	224	1,257	1,257	922
11/04/2011	2.74	2.74	2.74	2.74	254	254	1,273	1,273	1,273
11/05/2011	2.77	2.77	2.77	2.77	256	256	1,617	1,617	1,617
11/06/2011	2.78	2.78	2.78	2.78	258	258	1,642	1,642	1,642
11/07/2011	2.80	2.80	2.80	2.80	260	260	1,715	1,715	1,715
11/08/2011	2.75	2.75	2.76	2.76	254	254	1,684	1,684	1,684
11/09/2011	2.70	2.70	2.70	2.70	249	249	1,679	1,679	1,679
11/10/2011	2.70	2.70	2.70	2.70	248	248	1,582	1,582	1,582
11/11/2011	2.81	2.81	2.80	2.80	260	260	1,662	1,662	1,662
11/12/2011	2.92	2.92	2.92	2.92	273	273	1,806	1,806	1,806
11/13/2011	2.88	2.88	2.88	2.88	267	267	1,944	1,944	1,944
11/14/2011	2.78	2.78	2.78	2.78	256	256	1,940	1,940	1,940
11/15/2011	3.38	3.38	3.38	2.89	225	225	1,766	1,766	1,508
11/16/2011	2.67	2.67	2.66	2.66	245	245	1,408	1,408	1,408
11/17/2011	2.69	2.69	2.70	2.70	246	246	1,651	1,651	1,651
11/18/2011	2.69	2.68	2.68	2.68	244	244	1,686	1,686	1,686
11/19/2011	2.77	2.77	2.76	2.76	253	253	1,709	1,709	1,709
11/20/2011	2.85	2.85	2.84	2.84	261	261	1,794	1,794	1,794
11/21/2011	2.89	2.89	2.89	2.89	266	266	1,807	1,807	1,807
11/22/2011	2.82	2.82	2.82	2.82	261	261	1,820	1,820	1,820
11/23/2011	2.84	2.84	2.84	2.84	263	263	1,692	1,692	1,692
11/24/2011	2.75	2.75	2.74	2.74	251	251	1,693	1,693	1,693
11/25/2011	2.81	2.81	2.81	2.81	258	258	1,630	1,630	1,630
11/26/2011	2.79	2.79	2.79	2.79	256	256	1,688	1,688	1,688
11/27/2011	2.79	2.79	2.78	2.78	255	255	1,681	1,681	1,681
11/28/2011	2.77	2.77	2.76	2.76	252	252	1,674	1,674	1,674
11/29/2011	2.77	2.77	2.76	2.76	251	251	1,661	1,661	1,661
11/30/2011	2.83	2.83	2.83	2.83	260	260	1,672	1,672	1,672
12/01/2011	2.75	2.75	2.74	2.74	251	251	1,715	1,715	1,715
12/02/2011	2.81	2.81	2.80	2.80	258	258	1,671	1,671	1,671
12/03/2011	2.73	2.73	2.73	2.73	248	248	1,690	1,690	1,690
12/04/2011	2.84	2.84	2.84	2.84	262	262	1,623	1,623	1,623

Adjusted Daily Values

Date	Raw 15-min SO2 Avg	Adj. 15 min SO2 Avg	Raw 3-hr SO2 Avg	Adj. 3-hr SO2 Avg	Raw ppmv SO2 Avg	Adj. ppmv SO2 Avg	Raw Daily Rate (SO2 lb/day)	Adj. Daily Rate (SO2 lb/day)	Final Daily Rate (SO2 lb/day)
12/05/2011	2.77	2.77	2.77	2.77	255	255	1,686	1,686	1,686
12/06/2011	2.65	2.65	2.69	2.69	243	243	1,536	1,536	1,536
12/07/2011	2.80	2.80	2.80	2.80	262	262	1,252	1,252	1,252
12/08/2011	2.88	2.88	2.87	2.87	271	271	1,224	1,224	1,224
12/09/2011	2.88	2.88	2.88	2.88	269	269	1,259	1,259	1,259
12/10/2011	3.01	3.01	2.99	2.99	285	285	1,256	1,256	1,256
12/11/2011	3.00	3.00	3.00	3.00	284	284	1,307	1,307	1,307
12/12/2011	2.92	2.92	2.92	2.92	272	272	1,296	1,296	1,296
12/13/2011	2.90	2.90	2.89	2.89	270	270	1,235	1,235	1,235
12/14/2011	2.84	2.84	2.85	2.85	263	263	1,235	1,235	1,235
12/15/2011	2.82	2.82	2.82	2.82	260	260	1,214	1,214	1,214
12/16/2011	2.89	2.89	2.88	2.88	267	267	1,192	1,192	1,192
12/17/2011	2.80	2.80	2.80	2.80	255	255	1,231	1,231	1,231
12/18/2011	2.78	2.78	2.78	2.78	253	253	1,199	1,199	1,199
12/19/2011	2.83	2.83	2.82	2.82	260	260	1,187	1,187	1,187
12/20/2011	2.80	2.80	2.80	2.80	257	257	1,205	1,205	1,205
12/21/2011	2.87	2.87	2.86	2.86	262	262	1,167	1,167	1,167
12/22/2011	2.75	2.75	2.77	2.77	250	250	1,192	1,192	1,192
12/23/2011	2.76	2.76	2.75	2.75	250	250	1,142	1,142	1,142
12/24/2011	2.76	2.76	2.76	2.76	249	249	1,138	1,138	1,138
12/25/2011	2.77	2.77	2.76	2.76	251	251	1,145	1,145	1,145
12/26/2011	2.81	2.81	2.80	2.80	256	256	1,142	1,142	1,142
12/27/2011	2.86	2.86	2.86	2.86	263	263	1,164	1,164	1,164
12/28/2011	2.83	2.83	2.83	2.83	261	261	1,184	1,184	1,184
12/29/2011	2.85	2.85	2.85	2.85	262	262	1,173	1,173	1,173
12/30/2011	3.05	3.05	3.03	3.03	285	285	1,117	1,117	1,117
12/31/2011	3.01	3.01	3.01	3.01	279	279	1,145	1,145	1,145
01/01/2012	3.06	3.06	3.05	3.05	286	286	1,129	1,129	1,129
01/02/2012	3.12	3.12	3.11	3.11	293	293	1,127	1,127	1,127
01/03/2012	3.44	3.42	3.37	3.35	298	298	1,146	1,146	1,139
01/04/2012	3.14	3.14	3.15	3.15	295	295	1,154	1,154	1,154
01/05/2012	3.01	3.01	3.01	3.01	281	281	1,133	1,133	1,133
01/06/2012	3.06	3.06	3.05	3.05	285	285	1,099	1,099	1,099
01/07/2012	3.08	3.08	3.08	3.08	289	289	1,119	1,119	1,119
01/08/2012	3.01	3.01	3.00	3.00	281	281	1,132	1,132	1,132
01/09/2012	2.92	2.92	2.93	2.93	269	269	1,103	1,103	1,103
01/10/2012	2.84	2.84	2.84	2.84	259	259	1,072	1,072	1,072
01/11/2012	2.75	2.75	2.74	2.74	249	249	1,038	1,038	1,038
01/12/2012	2.95	2.95	2.96	2.96	272	272	1,000	1,000	1,000
01/13/2012	2.96	2.96	2.95	2.95	274	274	1,069	1,069	1,069
01/14/2012	2.77	2.77	2.77	2.77	250	250	1,070	1,070	1,070
01/15/2012	2.88	2.88	2.87	2.87	264	264	1,004	1,004	1,004
01/16/2012	2.82	2.82	2.83	2.83	257	257	1,044	1,044	1,044
01/17/2012	2.64	2.64	2.64	2.64	236	236	1,008	1,008	1,008
01/18/2012	2.57	2.57	2.57	2.57	229	229	944	944	944
01/19/2012	2.71	2.71	2.69	2.69	246	246	935	935	935
01/20/2012	3.05	3.05	3.04	3.04	282	282	987	987	987
01/21/2012	2.45	2.45	2.53	2.53	227	227	1,073	1,073	1,073
01/22/2012	3.34	3.34	3.30	3.30	298	298	882	882	882
01/23/2012	2.82	2.82	2.81	2.81	258	258	1,161	1,161	1,161
01/24/2012	2.94	2.94	2.92	2.92	265	265	1,177	1,177	1,177
01/25/2012	3.18	3.18	3.17	3.17	291	291	1,272	1,272	1,272
01/26/2012	3.22	3.22	3.21	3.21	296	296	1,169	1,169	1,169
01/27/2012	3.17	3.17	3.17	3.17	285	285	1,179	1,179	1,179
01/28/2012	3.32	3.32	3.31	3.31	305	305	1,114	1,114	1,114
01/29/2012	3.35	3.35	3.35	3.35	310	310	1,167	1,167	1,167
01/30/2012	3.42	3.42	3.41	3.41	317	317	1,184	1,184	1,184
01/31/2012	3.27	3.27	3.27	3.27	299	299	1,212	1,212	1,212
02/01/2012	3.32	3.32	3.31	3.31	306	306	1,160	1,160	1,160
02/02/2012	3.31	3.31	3.30	3.30	304	304	1,174	1,174	1,174
02/03/2012	3.39	3.39	3.39	3.39	315	315	1,174	1,174	1,174
02/04/2012	3.37	3.37	3.37	3.37	311	311	1,205	1,205	1,205

Adjusted Daily Values

Date	Raw 15-min SO2 Avg	Adj. 15-min SO2 Avg	Raw 3-hr SO2 Avg	Adj. 3-hr SO2 Avg	Raw ppmv SO2 Avg	Adj. ppmv SO2 Avg	Raw Daily Rate (SO2 lb/day)	Adj. Daily Rate (SO2 lb/day)	Final Daily Rate (SO2 lb/day)
02/05/2012	3.36	3.36	3.36	3.36	309	309	1,185	1,185	1,185
02/06/2012	1.05	3.98	0.99	3.06	339	330	1,182	1,182	1,153
02/07/2012	3.04	3.13	3.07	3.07	288	288	1,127	1,127	1,127
02/08/2012	2.76	2.76	2.76	2.76	250	250	1,197	1,197	1,197
02/09/2012	2.78	2.78	2.78	2.78	254	254	1,051	1,051	1,051
02/10/2012	2.70	2.70	2.69	2.69	246	246	1,056	1,056	1,056
02/11/2012	2.70	2.70	2.70	2.70	246	246	1,024	1,024	1,024
02/12/2012	2.64	2.64	2.64	2.64	240	240	1,026	1,026	1,026
02/13/2012	2.61	2.61	2.61	2.61	236	236	1,000	1,000	1,000
02/14/2012	2.62	2.62	2.61	2.61	237	237	993	993	993
02/15/2012	2.43	2.43	2.45	2.45	217	217	993	993	993
02/16/2012	2.58	2.58	2.56	2.56	234	234	933	933	933
02/17/2012	2.75	2.75	2.74	2.74	253	253	976	976	976
02/18/2012	2.66	2.66	2.66	2.66	241	241	1,060	1,060	1,060
02/19/2012	2.62	2.62	2.62	2.62	236	236	1,028	1,028	1,028
02/20/2012	2.58	2.58	2.57	2.57	231	231	1,015	1,015	1,015
02/21/2012	2.51	2.51	2.51	2.51	224	224	998	998	998
02/22/2012	2.47	2.47	2.47	2.47	219	219	973	973	973
02/23/2012	2.51	2.51	2.51	2.51	226	226	947	947	947
02/24/2012	2.56	2.56	2.55	2.55	231	231	951	951	951
02/25/2012	2.60	2.60	2.60	2.60	235	235	962	962	962
02/26/2012	2.65	2.65	2.64	2.64	241	241	968	968	968
02/27/2012	2.70	2.70	2.69	2.69	246	246	987	987	987
02/28/2012	2.60	2.60	2.60	2.60	235	235	1,004	1,004	1,004
02/29/2012	2.78	2.78	2.78	2.78	255	255	970	970	970
03/01/2012	2.78	2.78	2.77	2.77	256	256	1,098	1,098	1,098
03/02/2012	2.72	2.72	2.74	2.74	249	249	1,101	1,101	1,101
03/03/2012	2.61	2.61	2.63	2.62	229	229	1,065	1,065	1,060
03/04/2012	2.29	2.29	2.27	2.27	201	201	964	964	964
03/05/2012	3.57	3.08	3.55	2.79	226	221	839	839	658
03/06/2012	2.93	2.93	2.90	2.90	263	263	778	778	778
03/07/2012	3.11	3.11	3.10	3.10	278	278	1,041	1,041	1,041
03/08/2012	3.14	3.14	3.14	3.14	285	285	1,122	1,122	1,122
03/09/2012	3.15	3.15	3.15	3.15	285	285	1,131	1,131	1,131
03/10/2012	3.22	3.22	3.21	3.21	295	295	1,129	1,129	1,129
03/11/2012	3.16	3.16	3.16	3.16	287	287	1,149	1,149	1,149
03/12/2012	3.13	3.13	3.13	3.13	283	283	1,082	1,082	1,082
03/13/2012	3.19	3.19	3.19	3.19	289	289	1,123	1,123	1,123
03/14/2012	3.09	3.09	3.10	3.10	277	277	1,153	1,153	1,153
03/15/2012	2.97	2.97	2.96	2.96	269	269	1,146	1,146	1,146
03/16/2012	3.04	3.04	3.03	3.03	276	276	1,245	1,245	1,245
03/17/2012	3.17	3.17	3.17	3.17	290	290	1,490	1,490	1,490
03/18/2012	2.97	2.97	2.97	2.97	268	268	1,728	1,728	1,728
03/19/2012	2.98	2.98	2.98	2.98	271	271	1,489	1,489	1,489
03/20/2012	3.13	3.13	3.10	3.10	288	288	1,355	1,355	1,355
03/21/2012	3.16	3.16	3.15	3.15	289	289	1,487	1,487	1,487
03/22/2012	3.07	3.07	3.10	3.10	280	280	1,450	1,450	1,450
03/23/2012	2.83	2.83	2.81	2.81	256	256	1,578	1,578	1,578
03/24/2012	2.96	2.96	2.95	2.95	270	270	1,507	1,507	1,507
03/25/2012	3.12	3.12	3.11	3.11	285	285	1,618	1,618	1,618
03/26/2012	3.19	3.19	3.19	3.19	291	291	1,716	1,716	1,716
03/27/2012	3.25	3.25	3.24	3.24	299	299	1,760	1,760	1,760
03/28/2012	3.05	3.05	3.06	3.06	279	279	1,800	1,800	1,800
03/29/2012	2.99	2.99	2.98	2.98	275	275	1,680	1,680	1,680
03/30/2012	2.97	2.97	2.98	2.98	273	273	1,646	1,646	1,646
03/31/2012	2.90	2.90	2.89	2.89	264	264	1,665	1,665	1,665
04/01/2012	2.97	2.97	2.96	2.96	272	272	1,759	1,759	1,759
04/02/2012	2.97	2.97	2.97	2.97	272	272	1,787	1,787	1,787
04/03/2012	2.98	2.98	3.06	3.06	269	269	1,784	1,784	1,784
04/04/2012	3.18	3.18	3.16	3.16	291	291	1,786	1,786	1,786
04/05/2012	2.97	2.97	3.01	3.01	269	269	1,916	1,916	1,916
04/06/2012	2.80	2.80	2.80	2.80	253	253	1,667	1,667	1,667

Adjusted Daily Values

Date	Raw 15-min SO2 Avg	Adj. 15-min SO2 Avg	Raw 3-hr SO2 Avg	Adj. 3-hr SO2 Avg	Raw ppmv SO2 Avg	Adj. ppmv SO2 Avg	Raw Daily Rate (SO2 lb/day)	Adj. Daily Rate (SO2 lb/day)	Final Daily Rate (SO2 lb/day)
04/07/2012	3.00	3.00	2.98	2.98	277	277	1,477	1,477	1,477
04/08/2012	2.97	2.97	2.97	2.97	275	275	1,585	1,585	1,585
04/09/2012	2.95	2.95	2.94	2.94	271	271	1,559	1,559	1,559
04/10/2012	2.98	2.98	2.97	2.97	275	275	1,550	1,550	1,550
04/11/2012	2.97	2.97	2.97	2.97	273	273	1,562	1,562	1,562
04/12/2012	3.07	3.07	3.05	3.05	279	279	1,558	1,558	1,558
04/13/2012	3.06	3.06	3.07	3.07	275	275	1,613	1,613	1,613
04/14/2012	2.89	2.89	2.89	2.89	262	262	1,579	1,579	1,579
04/15/2012	2.85	2.85	2.85	2.85	257	257	1,515	1,515	1,515
04/16/2012	2.83	2.83	2.82	2.82	255	255	1,488	1,488	1,488
04/17/2012	4.93	4.48	4.95	3.26	278	278	1,481	1,481	975
04/18/2012	3.10	3.10	3.10	3.10	285	285	1,300	1,300	1,300
04/19/2012	3.06	3.06	3.05	3.05	281	281	1,680	1,680	1,680
04/20/2012	3.14	3.14	3.14	3.14	288	288	1,741	1,741	1,741
04/21/2012	3.13	3.13	3.13	3.13	286	286	1,861	1,861	1,861
04/22/2012	3.16	3.16	3.14	3.14	288	288	1,891	1,891	1,891
04/23/2012	3.20	3.20	3.19	3.19	290	290	1,936	1,936	1,936
04/24/2012	3.15	3.15	3.16	3.16	284	284	1,950	1,950	1,950
04/25/2012	3.11	3.11	3.10	3.10	283	283	1,905	1,905	1,905
04/26/2012	3.09	3.09	3.09	3.09	279	279	1,886	1,886	1,886
04/27/2012	3.10	3.10	3.10	3.10	284	284	1,861	1,861	1,861
04/28/2012	3.12	3.12	3.12	3.12	289	289	1,846	1,846	1,846
04/29/2012	3.12	3.12	3.11	3.11	287	287	1,873	1,873	1,873
04/30/2012	3.12	3.12	3.12	3.12	288	288	1,873	1,873	1,873
05/01/2012	2.87	3.10	2.87	2.87	289	289	1,867	1,867	1,867
05/02/2012	3.15	3.15	3.13	3.13	289	289	1,872	1,872	1,872
05/03/2012	3.18	3.18	3.19	3.19	292	292	1,880	1,880	1,880
05/04/2012	3.05	3.05	3.05	3.05	278	278	1,887	1,887	1,887
05/05/2012	3.07	3.07	3.08	3.08	281	281	1,806	1,806	1,806
05/06/2012	2.99	2.99	2.99	2.99	273	273	1,820	1,820	1,820
05/07/2012	2.99	2.99	2.98	2.98	273	273	1,782	1,782	1,782
05/08/2012	2.96	2.96	2.97	2.97	271	271	1,786	1,786	1,786
05/09/2012	2.92	2.92	2.92	2.92	267	267	1,769	1,769	1,769
05/10/2012	2.97	2.97	2.96	2.96	272	272	1,752	1,752	1,752
05/11/2012	2.89	2.89	2.90	2.90	263	263	1,819	1,819	1,819
05/12/2012	2.93	2.93	2.91	2.91	264	264	1,858	1,858	1,858
05/13/2012	3.08	3.08	3.06	3.06	278	278	1,901	1,901	1,901
05/14/2012	3.15	3.15	3.15	3.15	286	286	2,018	2,018	2,018
05/15/2012	3.22	3.22	3.21	3.21	295	295	2,083	2,083	2,083
05/16/2012	3.20	3.20	3.22	3.22	290	290	2,152	2,152	2,152
05/17/2012	2.98	2.98	2.98	2.98	271	271	2,113	2,113	2,113
05/18/2012	3.06	3.06	3.04	3.04	281	281	1,825	1,825	1,825
05/19/2012	3.22	3.22	3.21	3.21	297	297	1,674	1,674	1,674
05/20/2012	3.29	3.29	3.29	3.29	306	306	2,081	2,081	2,081
05/21/2012	3.18	3.18	3.19	3.19	291	291	2,158	2,158	2,158
05/22/2012	3.20	3.20	3.20	3.20	292	292	2,069	2,069	2,069
05/23/2012	3.19	3.19	3.18	3.18	291	291	2,075	2,075	2,075
05/24/2012	5.45	4.06	5.45	3.37	335	330	2,069	2,069	1,281
05/25/2012	3.32	3.32	3.32	3.32	306	306	1,948	1,948	1,948
05/26/2012	3.38	3.38	3.38	3.38	312	312	2,127	2,127	2,127
05/27/2012	3.40	3.40	3.40	3.40	314	314	2,199	2,199	2,199
05/28/2012	3.35	3.35	3.34	3.34	309	309	2,205	2,205	2,205
05/29/2012	3.33	3.33	3.33	3.33	306	306	2,178	2,178	2,178
05/30/2012	3.20	3.20	3.20	3.20	293	293	2,162	2,162	2,162
05/31/2012	3.22	3.22	3.22	3.22	296	296	2,083	2,083	2,083
06/01/2012	3.11	3.11	3.04	3.04	269	269	2,100	2,100	2,100
06/02/2012	3.30	3.30	3.30	3.30	301	301	1,488	1,488	1,488
06/03/2012	3.25	3.25	3.26	3.26	295	295	2,161	2,161	2,161
06/04/2012	3.34	3.34	3.33	3.33	305	305	2,134	2,134	2,134
06/05/2012	3.22	3.36	3.28	3.28	314	314	2,191	2,191	2,191
06/06/2012	3.25	3.25	3.26	3.26	298	298	2,232	2,232	2,232
06/07/2012	3.15	3.15	3.15	3.15	287	287	2,144	2,144	2,144

Adjusted Daily Values

Date	Raw 15-min SO2 Avg	Adj. 15-min SO2 Avg	Raw 3-hr SO2 Avg	Adj. 3-hr SO2 Avg	Raw ppmv SO2 Avg	Adj. ppmv SO2 Avg	Raw Daily Rate (SO2 lb/day)	Adj. Daily Rate (SO2 lb/day)	Final Daily Rate (SO2 lb/day)
06/08/2012	3.24	3.24	3.23	3.23	297	297	2,081	2,081	2,081
06/09/2012	3.15	3.15	3.15	3.15	287	287	2,140	2,140	2,140
06/10/2012	3.27	3.27	3.25	3.25	298	298	2,081	2,081	2,081
06/11/2012	3.25	3.25	3.25	3.25	293	293	2,164	2,164	2,164
06/12/2012	3.04	3.04	3.05	3.05	273	273	2,137	2,137	2,137
06/13/2012	3.07	3.07	3.06	3.06	278	278	2,000	2,000	2,000
06/14/2012	3.10	3.10	3.09	3.09	280	280	2,024	2,024	2,024
06/15/2012	2.93	2.93	2.94	2.94	265	265	2,047	2,047	2,047
06/16/2012	2.77	2.77	2.77	2.77	253	253	1,932	1,932	1,932
06/17/2012	2.90	2.90	2.87	2.87	263	263	1,822	1,822	1,822
06/18/2012	2.98	2.98	3.00	3.00	268	268	1,916	1,916	1,916
06/19/2012	0.00	0.00	0.00	0.00	0	0	0	0	0
06/20/2012	69.98	21.16	69.19	4.00	157	156	156	156	9
06/21/2012	16.33	7.43	17.60	2.99	54	54	87	87	15
06/22/2012	75.07	11.86	74.71	3.75	334	334	89	89	4
06/23/2012	3.18	3.18	3.16	3.16	292	292	882	882	882
06/24/2012	3.38	3.38	3.37	3.37	314	314	1,935	1,935	1,935
06/25/2012	3.36	3.36	3.35	3.35	312	312	2,278	2,278	2,278
06/26/2012	3.46	3.46	3.46	3.46	325	325	2,274	2,274	2,274
06/27/2012	3.43	3.43	3.43	3.43	323	323	2,359	2,359	2,359
06/28/2012	3.43	3.43	3.43	3.43	322	322	2,332	2,332	2,332
06/29/2012	3.35	3.35	3.34	3.34	311	311	2,325	2,325	2,325
06/30/2012	3.42	3.42	3.42	3.42	319	319	2,270	2,270	2,270
07/01/2012	3.42	3.42	3.41	3.41	320	320	2,328	2,328	2,328
07/02/2012	3.41	3.41	3.41	3.41	318	318	2,340	2,340	2,340
07/03/2012	3.42	3.42	3.43	3.43	311	311	2,320	2,320	2,320
07/04/2012	3.48	3.48	3.47	3.47	323	323	2,270	2,270	2,270
07/05/2012	3.45	3.45	3.44	3.44	319	319	2,347	2,347	2,347
07/06/2012	3.45	3.45	3.45	3.45	319	319	2,338	2,338	2,338
07/07/2012	3.37	3.37	3.37	3.37	310	310	2,331	2,331	2,331
07/08/2012	3.34	3.34	3.34	3.34	307	307	2,259	2,259	2,259
07/09/2012	3.35	3.35	3.35	3.35	307	307	2,240	2,240	2,240
07/10/2012	3.43	3.43	3.42	3.42	318	318	2,237	2,237	2,237
07/11/2012	3.43	3.43	3.43	3.43	318	318	2,299	2,299	2,299
07/12/2012	3.38	3.38	3.38	3.38	313	313	2,289	2,289	2,289
07/13/2012	3.39	3.39	3.37	3.37	311	311	2,252	2,252	2,252
07/14/2012	3.43	3.43	3.43	3.43	316	316	2,273	2,273	2,273
07/15/2012	3.47	3.47	3.46	3.46	321	321	2,306	2,306	2,306
07/16/2012	3.44	3.44	3.44	3.44	318	318	2,329	2,329	2,329
07/17/2012	3.07	3.07	3.14	3.14	276	276	2,327	2,327	2,327
07/18/2012	3.43	3.43	3.42	3.42	316	316	1,688	1,688	1,688
07/19/2012	3.48	3.48	3.48	3.48	320	320	2,235	2,235	2,235
07/20/2012	3.39	3.39	3.38	3.38	307	307	2,322	2,322	2,322
07/21/2012	3.52	3.52	3.52	3.52	323	323	1,633	1,633	1,633
07/22/2012	3.42	3.42	3.42	3.42	304	304	2,326	2,326	2,326
07/23/2012	3.39	3.39	3.39	3.39	311	311	2,199	2,199	2,199
07/24/2012	3.48	3.48	3.47	3.47	322	322	2,250	2,250	2,250
07/25/2012	3.49	3.49	3.48	3.48	323	323	2,336	2,336	2,336
07/26/2012	3.43	3.43	3.43	3.43	317	317	2,344	2,344	2,344
07/27/2012	3.33	3.33	3.32	3.32	305	305	2,302	2,302	2,302
07/28/2012	3.47	3.47	3.46	3.46	322	322	2,225	2,225	2,225
07/29/2012	3.44	3.44	3.44	3.44	320	320	2,340	2,340	2,340
07/30/2012	3.48	3.48	3.48	3.48	325	325	2,322	2,322	2,322
07/31/2012	3.48	3.48	3.48	3.48	324	324	2,340	2,340	2,340
08/01/2012	3.50	3.50	3.49	3.49	325	325	2,339	2,339	2,339
08/02/2012	79.33	11.41	76.74	3.65	370	350	0	0	0
08/03/2012	3.21	3.21	3.19	3.19	292	292	699	699	699
08/04/2012	3.14	3.14	3.14	3.14	282	282	1,365	1,365	1,365
08/05/2012	3.17	3.17	3.17	3.17	286	286	1,362	1,362	1,362
08/06/2012	3.14	3.14	3.15	3.15	283	283	1,371	1,371	1,371
08/07/2012	2.71	3.37	2.65	3.03	314	314	1,486	1,486	1,486
08/08/2012	3.44	3.44	3.44	3.44	318	318	2,317	2,317	2,317

Adjusted Daily Values

Date	Raw 15-min SO2 Avg	Adj. 15-min SO2 Avg	Raw 3-hr SO2 Avg	Adj. 3-hr SO2 Avg	Raw ppmv SO2 Avg	Adj. ppmv SO2 Avg	Raw Daily Rate (SO2 lb/day)	Adj. Daily Rate (SO2 lb/day)	Final Daily Rate (SO2 lb/day)
08/09/2012	3.37	3.37	3.37	3.37	299	299	2,335	2,335	2,335
08/10/2012	3.41	3.41	3.40	3.40	316	316	1,989	1,989	1,989
08/11/2012	3.50	3.50	3.49	3.49	323	323	2,276	2,276	2,276
08/12/2012	4.06	3.69	4.02	3.55	318	318	2,368	2,368	2,092
08/13/2012	3.44	3.44	3.44	3.44	316	316	2,323	2,323	2,323
08/14/2012	3.25	3.25	3.25	3.25	297	297	2,310	2,310	2,310
08/15/2012	3.39	3.39	3.37	3.37	306	306	2,154	2,154	2,154
08/16/2012	3.34	3.34	3.33	3.33	299	299	2,207	2,207	2,207
08/17/2012	3.36	3.36	3.36	3.36	305	305	1,918	1,918	1,918
08/18/2012	3.49	3.49	3.49	3.49	320	320	1,520	1,520	1,520
08/19/2012	3.52	3.52	3.52	3.52	324	324	1,584	1,584	1,584
08/20/2012	3.52	3.52	3.51	3.51	323	323	1,598	1,598	1,598
08/21/2012	3.54	3.54	3.54	3.54	325	325	1,593	1,593	1,593
08/22/2012	3.52	3.52	3.51	3.51	322	322	1,601	1,601	1,601
08/23/2012	3.48	3.48	3.49	3.49	317	317	1,580	1,580	1,580
08/24/2012	3.42	3.42	3.42	3.42	309	309	1,563	1,563	1,563
08/25/2012	2.98	3.67	3.34	3.39	318	318	1,535	1,535	1,535
08/26/2012	3.23	3.23	2.82	3.00	291	291	1,569	1,569	1,569
08/27/2012	3.26	3.26	3.23	3.23	297	297	1,455	1,455	1,455
08/28/2012	3.15	3.15	3.17	3.17	283	283	1,442	1,442	1,442
08/29/2012	3.24	3.24	3.22	3.22	296	296	1,349	1,349	1,349
08/30/2012	3.27	3.27	3.26	3.26	300	300	1,438	1,438	1,438
08/31/2012	3.28	3.28	3.28	3.28	299	299	1,484	1,484	1,484
09/01/2012	3.22	3.22	3.22	3.22	291	291	1,484	1,484	1,484
09/02/2012	3.10	3.10	3.10	3.10	278	278	1,453	1,453	1,453
09/03/2012	3.09	3.09	3.08	3.08	279	279	1,400	1,400	1,400
09/04/2012	3.25	3.25	3.24	3.23	284	284	1,401	1,401	1,396
09/05/2012	3.03	3.03	3.02	3.02	272	272	1,417	1,417	1,417
09/06/2012	3.29	3.29	3.30	3.30	306	306	1,369	1,369	1,369
09/07/2012	3.08	3.08	3.07	3.07	278	278	1,530	1,530	1,530
09/08/2012	3.36	3.36	3.34	3.34	309	309	1,642	1,642	1,642
09/09/2012	3.30	3.30	3.31	3.31	299	299	2,181	2,181	2,181
09/10/2012	3.29	3.29	3.29	3.29	297	297	2,201	2,201	2,201
09/11/2012	3.33	3.33	3.32	3.32	302	302	2,203	2,203	2,203
09/12/2012	3.29	3.29	3.29	3.29	297	297	2,231	2,231	2,231
09/13/2012	3.32	3.32	3.31	3.31	302	302	2,200	2,200	2,200
09/14/2012	3.39	3.39	3.39	3.39	312	312	2,218	2,218	2,218
09/15/2012	3.39	3.39	3.38	3.38	312	312	2,267	2,267	2,267
09/16/2012	3.16	3.16	3.18	3.18	290	290	2,268	2,268	2,268
09/17/2012	3.25	3.25	3.24	3.24	301	301	1,801	1,801	1,801
09/18/2012	3.31	3.31	3.31	3.31	304	304	1,859	1,859	1,859
09/19/2012	3.36	3.36	3.35	3.35	308	308	2,103	2,103	2,103
09/20/2012	3.37	3.37	3.38	3.38	310	310	2,132	2,132	2,132
09/21/2012	3.32	3.32	3.31	3.31	304	304	2,139	2,139	2,139
09/22/2012	0.00	0.00	0.00	0.00	0	0	0	0	0
09/23/2012	0.00	0.00	0.00	0.00	0	0	0	0	0
09/24/2012	0.00	0.00	0.00	0.00	0	0	0	0	0
09/25/2012	0.00	0.00	0.00	0.00	0	0	0	0	0
09/26/2012	0.00	0.00	0.00	0.00	0	0	0	0	0
09/27/2012	0.00	0.00	0.00	0.00	0	0	0	0	0
09/28/2012	0.00	0.00	0.00	0.00	0	0	0	0	0
09/29/2012	0.00	0.00	0.00	0.00	0	0	0	0	0
09/30/2012	0.00	0.00	0.00	0.00	0	0	0	0	0
10/01/2012	0.00	0.00	0.00	0.00	0	0	0	0	0
10/02/2012	0.00	0.00	0.00	0.00	0	0	0	0	0
10/03/2012	0.00	0.00	0.00	0.00	0	0	0	0	0
10/04/2012	0.00	0.00	0.00	0.00	0	0	0	0	0
10/05/2012	0.00	0.00	0.00	0.00	0	0	0	0	0
10/06/2012	0.00	0.00	0.00	0.00	0	0	0	0	0
10/07/2012	0.00	0.00	0.00	0.00	0	0	0	0	0
10/08/2012	0.00	0.00	0.00	0.00	0	0	0	0	0
10/09/2012	0.00	0.00	0.00	0.00	0	0	0	0	0

Adjusted Daily Values

Date	Raw 15-min SO2 Avg	Adj. 15-min SO2 Avg	Raw 3-hr SO2 Avg	Adj. 3-hr SO2 Avg	Raw ppmv SO2 Avg	Adj. ppmv SO2 Avg	Raw Daily Rate (SO2 lb/day)	Adj. Daily Rate (SO2 lb/day)	Final Daily Rate (SO2 lb/day)
10/10/2012	0.00	0.00	0.00	0.00	0	0	0	0	0
10/11/2012	0.00	0.00	0.00	0.00	0	0	0	0	0
10/12/2012	0.00	0.00	0.00	0.00	0	0	0	0	0
10/13/2012	2675.62	21.56	2392.41	4.00	1,625	1,358	0	0	0
10/14/2012	180.85	16.25	267.45	4.00	1,519	1,069	311	311	5
10/15/2012	159.68	15.61	159.45	4.00	427	427	525	525	13
10/16/2012	32.25	0.89	32.61	3.47	481	404	493	493	62
10/17/2012	3.21	3.21	3.21	3.21	286	286	1,732	1,732	1,732
10/18/2012	25.58	11.69	16.79	3.56	548	469	1,654	1,654	351
10/19/2012	19.33	17.13	19.71	4.00	319	315	1,673	1,673	340
10/20/2012	8.10	8.10	8.67	3.42	224	224	2,261	2,261	891
10/21/2012	2.90	2.90	2.88	2.88	250	250	1,408	1,408	1,408
10/22/2012	3.15	3.15	3.14	3.14	289	289	1,512	1,512	1,512
10/23/2012	3.10	3.10	3.10	3.10	278	278	1,762	1,762	1,762
10/24/2012	3.28	3.28	3.27	3.27	301	301	2,252	2,252	2,252
10/25/2012	3.21	3.21	3.22	3.22	293	293	1,833	1,833	1,833
10/26/2012	3.20	3.20	3.19	3.19	293	293	1,785	1,785	1,785
10/27/2012	3.26	3.26	3.27	3.27	297	297	1,784	1,784	1,784
10/28/2012	3.00	3.00	2.99	2.99	267	267	1,816	1,816	1,816
10/29/2012	3.01	3.01	3.01	3.01	269	269	1,670	1,670	1,670
10/30/2012	3.06	3.06	3.06	3.06	276	276	1,671	1,671	1,671
10/31/2012	3.17	3.17	3.15	3.15	288	288	1,702	1,702	1,702
11/01/2012	3.21	3.21	3.21	3.21	293	293	1,763	1,763	1,763
11/02/2012	3.26	3.26	3.26	3.26	299	299	1,786	1,786	1,786
11/03/2012	3.20	3.20	3.20	3.20	293	293	1,809	1,809	1,809
11/04/2012	3.15	3.15	3.15	3.15	287	287	1,778	1,778	1,778
11/05/2012	3.15	3.15	3.14	3.14	288	288	1,746	1,746	1,746
11/06/2012	3.25	3.25	3.25	3.25	296	296	1,742	1,742	1,742
11/07/2012	3.39	3.39	3.37	3.37	310	310	1,775	1,775	1,775
11/08/2012	3.41	3.41	3.41	3.41	311	311	1,879	1,879	1,879
11/09/2012	3.47	3.47	3.47	3.47	316	316	1,908	1,908	1,908
11/10/2012	3.53	3.53	3.53	3.53	324	324	1,934	1,934	1,934
11/11/2012	3.46	3.46	3.45	3.45	316	316	1,960	1,960	1,960
11/12/2012	3.48	3.48	3.48	3.48	320	320	1,915	1,915	1,915
11/13/2012	3.34	3.34	3.34	3.34	304	304	1,924	1,924	1,924
11/14/2012	3.36	3.36	3.35	3.35	304	304	1,850	1,850	1,850
11/15/2012	3.32	3.32	3.35	3.35	300	300	1,883	1,883	1,883
11/16/2012	3.37	3.37	3.36	3.36	298	298	1,919	1,919	1,919
11/17/2012	3.36	3.36	3.35	3.35	300	300	1,907	1,907	1,907
11/18/2012	3.45	3.45	3.45	3.45	313	313	1,957	1,957	1,957
11/19/2012	3.36	3.36	3.36	3.36	305	305	2,006	2,006	2,006
11/20/2012	3.38	3.38	3.37	3.37	306	306	1,947	1,947	1,947
11/21/2012	3.24	3.24	3.25	3.25	291	291	1,955	1,955	1,955
11/22/2012	3.25	3.25	3.25	3.25	292	292	1,880	1,880	1,880
11/23/2012	3.21	3.21	3.21	3.21	285	285	1,877	1,877	1,877
11/24/2012	3.22	3.22	3.20	3.20	286	286	1,847	1,847	1,847
11/25/2012	3.33	3.33	3.34	3.34	299	299	1,847	1,847	1,847
11/26/2012	3.23	3.23	3.24	3.24	288	288	1,930	1,930	1,930
11/27/2012	3.34	3.34	3.33	3.33	298	298	1,866	1,866	1,866
11/28/2012	3.52	3.52	3.51	3.51	318	318	1,920	1,920	1,920
11/29/2012	3.52	3.52	3.52	3.52	318	318	2,036	2,036	2,036
11/30/2012	3.51	3.51	3.52	3.52	317	317	2,041	2,041	2,041
12/01/2012	3.33	3.33	3.33	3.33	301	301	2,054	2,054	2,054
12/02/2012	3.42	3.42	3.42	3.42	310	310	1,946	1,946	1,946
12/03/2012	3.37	3.37	3.36	3.36	305	305	1,911	1,911	1,911
12/04/2012	30965.01	12.17	27035.37	3.80	984	704	1,708	1,708	0
12/05/2012	2960.37	14.71	7061.26	3.43	719	462	696	696	0
12/06/2012	39.23	12.75	100.52	3.80	218	218	34	34	1
12/07/2012	2957.55	6.28	2570.46	3.35	228	228	545	545	1
12/08/2012	3.14	3.14	3.12	3.12	292	292	823	823	823
12/09/2012	3.00	3.00	3.00	3.00	278	278	1,410	1,410	1,410
12/10/2012	2.49	2.49	2.51	2.51	223	223	1,350	1,350	1,350

Adjusted Daily Values

Date	Raw 15-min SO2 Avg	Adj. 15-min SO2 Avg	Raw 3-hr SO2 Avg	Adj. 3-hr SO2 Avg	Raw ppmv SO2 Avg	Adj. ppmv SO2 Avg	Raw Daily Rate (SO2 lb/day)	Adj. Daily Rate (SO2 lb/day)	Final Daily Rate (SO2 lb/day)
12/11/2012	2.85	2.85	2.82	2.82	260	260	1,067	1,067	1,067
12/12/2012	2.91	2.91	2.90	2.90	262	262	1,097	1,097	1,097
12/13/2012	3.03	3.03	3.05	3.05	276	276	1,049	1,049	1,049
12/14/2012	3.03	3.03	3.00	3.00	276	276	1,078	1,078	1,078
12/15/2012	2.92	2.92	2.92	2.92	265	265	1,049	1,049	1,049
12/16/2012	3.12	3.12	3.11	3.11	285	285	1,007	1,007	1,007
12/17/2012	3.10	3.10	3.11	3.11	283	283	1,071	1,071	1,071
12/18/2012	3.10	3.10	3.10	3.10	283	283	1,070	1,070	1,070
12/19/2012	2.58	2.58	2.62	2.62	233	233	1,060	1,060	1,060
12/20/2012	2.58	2.58	2.56	2.56	237	237	1,075	1,075	1,075
12/21/2012	2.47	2.47	2.47	2.47	225	225	1,453	1,453	1,453
12/22/2012	2.50	2.50	2.49	2.49	226	226	1,393	1,393	1,393
12/23/2012	2.51	2.51	2.51	2.51	228	228	1,406	1,406	1,406
12/24/2012	2.46	2.46	2.47	2.47	221	221	1,418	1,418	1,418
12/25/2012	2.43	2.43	2.41	2.41	221	221	1,377	1,377	1,377
12/26/2012	2.47	2.47	2.46	2.46	224	224	1,359	1,359	1,359
12/27/2012	2.45	2.45	2.46	2.46	221	221	1,386	1,386	1,386
12/28/2012	2.38	2.38	2.36	2.36	215	215	1,232	1,232	1,232
12/29/2012	2.64	2.64	2.64	2.64	240	240	1,048	1,048	1,048
12/30/2012	2.62	2.62	2.60	2.60	240	240	1,165	1,165	1,165
12/31/2012	2.56	2.56	2.58	2.58	230	230	1,087	1,087	1,087
01/01/2013	3.01	3.01	3.00	3.00	274	274	833	833	833
01/02/2013	3.01	3.01	3.00	3.00	272	272	1,084	1,084	1,084
01/03/2013	2.98	2.98	2.98	2.98	270	270	1,089	1,089	1,089
01/04/2013	2.99	2.99	2.98	2.98	272	272	1,077	1,077	1,077
01/05/2013	3.00	3.00	3.05	3.05	271	271	1,077	1,077	1,077
01/06/2013	2.89	2.89	2.82	2.82	258	258	1,057	1,057	1,057
01/07/2013	3.29	3.29	3.32	3.32	300	300	986	986	986
01/08/2013	2.54	2.69	2.56	2.56	245	245	1,172	1,172	1,172
01/09/2013	5.85	3.15	5.85	2.71	210	210	965	965	446
01/10/2013	2.39	2.39	2.40	2.40	217	217	723	723	723
01/11/2013	2.26	2.26	2.26	2.26	203	203	865	865	865
01/12/2013	9.87	5.08	9.96	2.92	237	237	837	837	246
01/13/2013	2.36	2.36	2.37	2.37	213	213	709	709	709
01/14/2013	2.47	2.47	2.46	2.46	225	225	839	839	839
01/15/2013	3.06	3.06	3.02	2.80	225	225	876	876	612
01/16/2013	2.73	2.73	2.74	2.74	250	250	841	841	841
01/17/2013	2.69	2.69	2.68	2.68	245	245	978	978	978
01/18/2013	2.55	2.55	2.55	2.55	230	230	958	958	958
01/19/2013	2.51	2.51	2.51	2.51	225	225	903	903	903
01/20/2013	2.52	2.52	2.50	2.50	227	227	899	899	899
01/21/2013	2.67	2.67	2.67	2.67	242	242	909	909	909
01/22/2013	2.74	2.74	2.73	2.73	250	250	967	967	967
01/23/2013	2.87	2.87	2.88	2.88	262	262	988	988	988
01/24/2013	2.74	2.74	2.74	2.74	248	248	1,033	1,033	1,033
01/25/2013	2.75	2.75	2.75	2.75	251	251	989	989	989
01/26/2013	2.77	2.77	2.76	2.76	254	254	1,000	1,000	1,000
01/27/2013	2.68	2.68	2.68	2.68	242	242	1,006	1,006	1,006
01/28/2013	2.74	2.74	2.74	2.74	250	250	956	956	956
01/29/2013	2.68	2.68	2.68	2.68	243	243	989	989	989
01/30/2013	2.68	2.68	2.66	2.66	245	245	962	962	962
01/31/2013	2.72	2.72	2.71	2.71	247	247	960	960	960
02/01/2013	2.60	2.60	2.61	2.61	235	235	973	973	973
02/02/2013	2.70	2.70	2.70	2.70	245	245	924	924	924
02/03/2013	2.80	2.80	2.80	2.80	256	256	965	965	965
02/04/2013	2.60	2.60	2.59	2.59	235	235	1,004	1,004	1,004
02/05/2013	10.48	2.82	11.69	2.78	238	238	934	934	222
02/06/2013	2.74	2.74	2.75	2.75	250	250	951	951	951
02/07/2013	2.71	2.71	2.70	2.70	245	245	991	991	991
02/08/2013	2.63	2.63	2.64	2.64	239	239	965	965	965
02/09/2013	2.54	2.54	2.55	2.55	230	230	767	767	767
02/10/2013	2.51	2.51	2.50	2.50	226	226	934	934	934

Adjusted Daily Values

Date	Raw 15-min SO2 Avg	Adj. 15-min SO2 Avg	Raw 3-hr SO2 Avg	Adj. 3-hr SO2 Avg	Raw ppmv SO2 Avg	Adj. ppmv SO2 Avg	Raw Daily Rate (SO2 lb/day)	Adj. Daily Rate (SO2 lb/day)	Final Daily Rate (SO2 lb/day)
02/11/2013	2.51	2.51	2.51	2.51	228	228	913	913	913
02/12/2013	2.38	2.38	2.39	2.39	215	215	910	910	910
02/13/2013	2.31	2.31	2.31	2.31	211	211	935	935	935
02/14/2013	2.20	2.20	2.19	2.19	199	199	1,040	1,040	1,040
02/15/2013	2.18	2.18	2.18	2.18	198	198	991	991	991
02/16/2013	2.13	2.13	2.13	2.13	193	193	1,039	1,039	1,039
02/17/2013	2.11	2.11	2.11	2.11	190	190	1,067	1,067	1,067
02/18/2013	2.21	2.21	2.19	2.19	200	200	1,059	1,059	1,059
02/19/2013	2.14	2.14	2.14	2.14	193	193	1,101	1,101	1,101
02/20/2013	2.24	2.24	2.23	2.23	204	204	1,074	1,074	1,074
02/21/2013	2.23	2.23	2.23	2.23	204	204	1,121	1,121	1,121
02/22/2013	2.18	2.18	2.18	2.18	199	199	1,184	1,184	1,184
02/23/2013	2.37	2.37	2.36	2.36	219	219	1,289	1,289	1,289
02/24/2013	2.30	2.30	2.30	2.30	211	211	1,493	1,493	1,493
02/25/2013	2.19	2.19	2.19	2.19	200	200	1,447	1,447	1,447
02/26/2013	2.32	2.32	2.32	2.32	215	215	1,386	1,386	1,386
02/27/2013	2.19	2.19	2.19	2.19	200	200	1,469	1,469	1,469
02/28/2013	2.19	2.19	2.19	2.19	200	200	1,389	1,389	1,389
03/01/2013	2.10	2.10	2.10	2.10	190	190	1,386	1,386	1,386
03/02/2013	2.32	2.32	2.31	2.31	215	215	1,362	1,362	1,362
03/03/2013	2.39	2.39	2.37	2.37	222	222	1,526	1,526	1,526
03/04/2013	2.45	2.45	2.46	2.46	227	227	1,573	1,573	1,573
03/05/2013	2.61	2.61	2.61	2.61	230	230	1,618	1,618	1,618
03/06/2013	2.51	2.51	2.51	2.51	230	230	1,634	1,634	1,634
03/07/2013	2.63	2.63	2.62	2.62	243	243	1,648	1,648	1,648
03/08/2013	2.51	2.51	2.51	2.51	229	229	1,730	1,730	1,730
03/09/2013	128.33	17.88	109.96	3.77	1,811	1,483	1,670	1,670	57
03/10/2013	456.87	10.75	479.66	2.43	713	566	299	299	2
03/11/2013	5.16	5.06	5.13	2.38	140	140	0	0	0
03/12/2013	1352.31	13.40	1648.90	3.67	775	681	250	250	1
03/13/2013	0.00	4.54	0.00	1.50	281	281	188	188	0
03/14/2013	0.00	7.23	0.00	2.02	392	386	83	83	0
03/15/2013	2.94	2.94	0.00	2.65	264	264	604	604	0
03/16/2013	2.61	2.61	2.62	2.62	234	234	987	987	987
03/17/2013	2.43	2.43	2.41	2.41	218	218	899	899	899
03/18/2013	2.20	2.20	2.17	2.17	210	210	899	899	899
03/19/2013	2.07	2.07	2.05	2.05	200	200	899	899	899
03/20/2013	1.97	1.97	1.99	1.99	192	192	899	899	899
03/21/2013	1.93	1.93	1.92	1.92	184	184	3,212	2,461	2,461
03/22/2013	1.98	1.98	1.98	1.98	177	177	1,048	1,048	1,048
03/23/2013	1.98	1.98	1.98	1.98	181	181	1,086	1,086	1,086
03/24/2013	2.01	2.01	2.01	2.01	185	185	1,091	1,091	1,091
03/25/2013	2.00	2.00	2.00	2.00	184	184	1,118	1,118	1,118
03/26/2013	1.97	1.97	1.97	1.97	181	181	1,119	1,119	1,119
03/27/2013	1.93	1.93	1.92	1.92	176	176	1,110	1,110	1,110
03/28/2013	1.92	1.92	1.93	1.93	176	176	1,086	1,086	1,086
03/29/2013	1.90	1.90	1.90	1.90	175	175	1,084	1,084	1,084
03/30/2013	1.92	1.92	1.91	1.91	178	178	1,080	1,080	1,080
03/31/2013	1.99	1.99	1.98	1.98	184	184	1,097	1,097	1,097

Appendix C

Permit to Operate N-767-9-21

San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: N-767-9-21 **EXPIRATION DATE:** 11/30/2019

EQUIPMENT DESCRIPTION:
SULFURIC ACID PRODUCTION PLANT CONSISTING OF A SULFUR FURNACE, TWO CONVERTERS, SIX WASTE HEAT RECOVERY BOILERS, A DRYING TOWER WITH AN ENTRAINMENT SEPARATOR, AN INTERSTAGE ABSORPTION TOWER WITH A MIST ELIMINATOR, A FINAL TOWER WITH A MIST ELIMINATOR, 15.0 MMBTU/HR ZEECO USA LLC MODEL GB-8 NATURAL GAS-FIRED FURNACE IGNITER BURNER (4919-H-304), AND ASSOCIATED EQUIPMENT.

PERMIT UNIT REQUIREMENTS

1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201 and 4202] Federally Enforceable Through Title V Permit
2. The overall oxides of sulfur emissions as SO2 from the sulfuric acid plant (including fugitive sulfur compound leak emissions) shall not exceed 2.5 pounds per ton of 100% sulfuric acid produced except during periods of start-up and shutdown. [District Rule 2201] Federally Enforceable Through Title V Permit
3. The overall oxides of sulfur emissions as SO2 from the sulfuric acid plant (including fugitive sulfur compound leak emissions) shall not exceed 21.5 pounds per ton of 100% sulfuric acid produced during periods of start-up and shutdown. This performance based limit is to enforce the SOx emission reductions granted by certificates N-74-5 and N-1250-5. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Emissions of oxides of sulfur as SO2 from the entire sulfuric acid plant (including fugitive sulfur compound leak emissions) shall not exceed 1,750 pounds during any one day and 410,296 pounds during any 12-consecutive month period. This performance based limit is to enforce the SOx emission reductions granted by certificates N-75-5 and N-1250-5. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Sulfur compound emissions from the sulfuric acid plant exhaust stack shall not exceed 0.2% by volume, 2000 ppmv, on a dry basis averaged over 15 consecutive minutes. [District Rule 4801 and Rule 407 (San Joaquin)] Federally Enforceable Through Title V Permit
6. The facility shall not discharge into the atmosphere any gases which contain acid mist, expressed as sulfuric acid, in excess of 0.3 pounds per ton of 100% sulfuric acid produced. [District Rules 2201 and 4802] Federally Enforceable Through Title V Permit
7. The oxides of sulfur emissions as SO2 from the sulfuric acid plant shall be determined using the procedures specified in 40 CFR 60.84. [District Rule 2201 and 40 CFR Part 60, Subpart H] Federally Enforceable Through Title V Permit
8. The quantity of sulfuric acid produced shall not exceed 700 tons during any one day. [District Rule 2201]
9. NOx emissions from the sulfur furnace serving the sulfuric acid plant shall not exceed 0.154 lb-NOx per ton of sulfuric acid produced. [District Rule 2201]
10. The Zeeco USA LLC furnace igniter burner shall only be fired on natural gas. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Heat input to the Zeeco USA LLC furnace igniter burner shall not exceed 21,000 MMBtu in any one rolling 12 month period. [District Rule 2201] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

12. The Zeeco USA LLC furnace igniter burner shall be equipped with an operational non-resettable totalizing mass or volumetric fuel flow meter to measure the amount of natural gas combusted in the igniter burner or other District approved alternative. [District Rule 2201] Federally Enforceable Through Title V Permit

13. Emissions from the Zeeco USA LLC furnace igniter burner shall not exceed any of the following limits: 0.061 lb-NOx/MMBtu, 0.00285 lb-SOx/MMBtu, 0.005 lb-PM10/MMBtu, 0.111 lb-CO/MMBtu, or 0.003 lb-VOC/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit

14. A source test for oxides of sulfur shall be conducted on an annual basis. [District Rule 1081] Federally Enforceable Through Title V Permit

15. The results of each test shall be submitted for District evaluation no later than 60 days following each test. [District Rule 1081] Federally Enforceable Through Title V Permit

16. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit

17. Source testing to measure concentrations of oxides of sulfur shall be conducted using either CARB Method 6, CARB Method 8, CARB Method 100, EPA Method 6, or EPA Method 8. [District Rule 1081] Federally Enforceable Through Title V Permit

18. Source testing to measure stack gas flow rate, moisture content, and oxygen content shall be conducted using EPA Methods 1 thru 4. [District Rule 1081] Federally Enforceable Through Title V Permit

19. An hourly log of sulfuric acid produced by each process line shall be kept on the premises at all times and shall be made available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit

20. The permittee shall provide, properly install and maintain in proper working order, continuous monitoring and recording systems to measure oxides of sulfur emissions as SO2. [District Rule 1080, 5.2.1] Federally Enforceable Through Title V Permit

21. The averaging time for the SO2 emission monitoring system shall not exceed 15 minutes. [District Rule 2080] Federally Enforceable Through Title V Permit

22. All continuous monitoring and recording instruments shall be installed, calibrated and operated in accordance with the requirements of 40 CFR 60.84. [District Rule 1080, 6.1.2] Federally Enforceable Through Title V Permit

23. The facility shall install and maintain equipment, facilities, and systems compatible with the District's CEM data polling software system and shall make CEM data available to the District's automated polling system on a daily basis. [District Rule 1080] Federally Enforceable Through Title V Permit

24. Upon notice by the District that the facility's CEM system is not providing polling data, the facility may continue to operate without providing automated data for a maximum of 30 days per calendar year provided the CEM data is sent to the District by a District-approved alternative method. [District Rule 1080] Federally Enforceable Through Title V Permit

25. The permittee shall submit a written report for each calendar quarter to the District no later than 30 days following the end of each calendar quarter. The report shall comply with all of the requirements of the District rules. [District Rule 1080, 8.0] Federally Enforceable Through Title V Permit

26. Source testing to measure sulfuric acid mist using EPA Method 8 of 40 CFR 60 Appendix A shall be conducted on an annual basis. [District Rule 2520, 9.3.2 and District Rule 4201] Federally Enforceable Through Title V Permit

27. A violation of emission standards of this permit, as shown by the stack-monitoring system, shall be reported to the district within 96 hours. [District Rule 1080, 9.0] Federally Enforceable Through Title V Permit

28. The operator shall notify the district at least 24 hours prior to the shutting down of monitoring equipment. In the event of breakdown of monitoring equipment, the owner or the operator shall notify the district within 8 hours after the breakdown is detected. [District Rule 1080, 10.0] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

29. The continuous SO2 monitor shall meet the applicable performance specification requirements in 40 CFR Part 51, Appendix P, and Part 60, Appendix B or shall meet equivalent specifications established by mutual agreement of District, CARB, and the EPA. [District Rule 1080, 6.5] Federally Enforceable Through Title V Permit

30. Visible emissions shall be inspected weekly during operation. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

31. The facility shall visually inspect for sulfur compound leaks at the sulfuric acid plant ducting and equipment each work shift when the plant is operating. Daily records shall be maintained to verify that a leak inspection was performed during each work shift. [District Rule 4102]

32. All sulfur compound leaks at the sulfuric acid plant ducting or equipment shall be reported to the District within 24 hours of detection. All leaks shall be repaired within 24 hours of detection. If the sulfur compound leaks cannot be repaired within 24 hours of detection, the plant shall be shut down until the leaks are repaired. [District Rule 4102]

33. For each sulfur compound leak occurrence, maintain a record indicating the following: (a). Date and time when the sulfur compound leak occurred; (b). Description (i.e. shape, size, type of leak, etc.) and location (relative to the nearest ductwork or equipment) of the sulfur compound leak; (c). Length of time to repair the sulfur compound leak (in minutes or hours); (d). The quantity of sulfur compound emissions from the leak (in pounds per hour); (e). The total quantity of plant sulfur compound emissions (in pounds per day) indicating whether excess emissions occurred due to the leak. [District Rule 4102]

34. The permittee shall maintain a daily record of the quantity of sulfuric acid produced in tons. [District Rules 1070 and 2201]

35. The permittee shall maintain a rolling 12-consecutive month total of the quantity of fuel heat input to the Zeeco USA LLC furnace igniter burner (in MMBtu) and shall update the rolling total at least once each month. The fuel heat input can be calculated by multiplying the amount of natural gas fuel combusted (in scf) by a heating value of 1,000 Btu/scf. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit

36. Permittee shall maintain a rolling 12-consecutive month total of the quantity of oxides of sulfur emissions (as SO2 in pounds) from the entire sulfuric acid plant (including fugitive sulfur compound leak emissions) and shall update the rolling total at least once each month. [District Rules 1070 and 2201]

37. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit

Order# 2982662

System ID# C2800165

RECEIVED
MAR 01 2017
SJVUAPCD

PUBLIC NOTICE CHECK LIST

PROJECT #: N-767 PROJECT #: N-1131840

REQST	COMPL.	
√	√	ERC FINAL PUBLIC NOTICE
√	☒	Newspaper Notice Emailed to Clerical (Check box and tab to generate Notice)
√	—	Send email to "OA-PublicNotices" containing the following: SUBJECT: J R Simplot Company, N-767, N-1131840, Final Notice BODY: Emission Reduction Credit banking

ENCLOSED DOCUMENTS REQUIRE:

√	√	Enter Correct Date, Print All Documents from File and Obtain Director's Signature and District Seal Embossed on ERC Certificates
√	√	Email ***FINAL*** Newspaper Notice for Publication in Stockton Record Pub Date: 3/16/17
√	√	Mail ***FINAL*** Notice Letter to Applicant by Certified Mail including the following attachments: √ Original ERC Certificates √ Newspaper Notice
√	√	Email ***FINAL*** Public Notice package to EPA
√	√	Email ***FINAL*** Public Notice package to CARB
√	√	Email ***FINAL*** Newspaper Notice, Aviso en Español and Public Notice package to ~~"webmaster"~~ Webteam
√	√	After posted on website, send email with weblink of Newspaper notice, Aviso en Español, and full public notice package to: √ specific [C, S, or N] region **and** District wide permitting notification list-serves (both English and Spanish list serves) √ facility specific distribution list, (AQE – enter email address from PAS facility details notifications tab, if none enter NONE below): NONE
√	√	Mail the newspaper notice and aviso en español (NN/AE), or full public notice package (FPNP) to the persons on facility specific distribution list, as follows (entered by AQE, if none, enter NONE below): ☐NN/AE or ☐FPNP Name/address:NONE ☐NN/AE or ☐FPNP Name/address:NONE
√	√	Send ***FINAL*** Public Notice package to EDMS
√	√	Assign Mailing Date MAR 01 2017
—	—	Other Special Instructions (please specify):_____

Date Completed [DATE COMPLETED] /By Kai Chan

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SAN JOAQUIN VALLEY AIR POLL CONTROL DIST
1990 E. GETTYSBURG AVE.
FRESNO, CA 93726

CNS 2982662

COPY OF NOTICE

Notice Type: GPN GOVT PUBLIC NOTICE

Ad Description ERC FINAL PUBLIC NOTICE; J R SIMPLOT, N-1131840, STOCKTON

To the right is a copy of the notice you sent to us for publication in the THE RECORD. Please read this notice carefully and call us with any corrections. The Proof of Publication will be filed with the County Clerk, if required, and mailed to you after the last date below. Publication date(s) for this notice is (are):

03/06/2017

The charge(s) for this order is as follows. An invoice will be sent after the last date of publication. If you prepaid this order in full, you will not receive an invoice.

NOTICE OF FINAL ACTION FOR THE ISSUANCE OF EMISSION REDUCTION CREDITS

NOTICE IS HEREBY GIVEN that the Air Pollution Control Officer has issued Emission Reduction Credits (ERCs) to J R Simplot Company for emission reductions generated by the replacement of the catalysts in the converters serving the sulfuric acid plant, at 16777 Howland Road in Lathrop, CA. The quantity of ERCs to be issued is 56,614 lb-SOx/year.

No comments were received following the District's preliminary decision on this project.

The application review for Project #N-1131840 is available for public inspection at http://www.valleyair.org/notices/public_notices_idx.htm, the SAN JOAQUIN VALLEY UNIFIED AIR POLLUTION CONTROL DISTRICT, 4800 ENTERPRISE WAY, MODESTO, CA 95356, and at any other District office. For additional information, please contact the District at (209) 557-6400.
3/6/17
CNS-2982662#
THE RECORD

A0000043728 42

Yolanda Sanchez

From: Yolanda Sanchez
Sent: Wednesday, March 1, 2017 10:27 AM
To: Gerardo Rios EPA (SJV_T5_Permits@epa.gov); Tung Le - CARB (ttle@arb.ca.gov)
Subject: ERC Final Public Notice for J R Simplot Company; Facility# N-767, Project# N-1131840
Attachments: Final N-1131840.pdf; Newspaper.pdf

Importance: High

NOTICE IS HEREBY GIVEN that the Air Pollution Control Officer has issued Emission Reduction Credits (ERCs) to J R Simplot Company for emission reductions generated by the replacement of the catalysts in the converters serving the sulfuric acid plant, at 16777 Howland Road in Lathrop, CA. The quantity of ERCs to be issued is 56,614 lb-SOx/year.

Yolanda Sanchez
Office Assistant II
SJVAPCD-Fresno
yolanda.sanchez@valleyair.org

Yolanda Sanchez

From:	Microsoft Outlook
To:	Gerardo Rios EPA (SJV_T5_Permits@epa.gov)
Sent:	Wednesday, March 1, 2017 10:27 AM
Subject:	Relayed: ERC Final Public Notice for J R Simplot Company; Facility# N-767, Project# N-1131840

Delivery to these recipients or groups is complete, but no delivery notification was sent by the destination server:

Gerardo Rios EPA (SJV_T5_Permits@epa.gov) (SJV_T5_Permits@epa.gov) <mailto:SJV_T5_Permits@epa.gov>

Subject: ERC Final Public Notice for J R Simplot Company; Facility# N-767, Project# N-1131840

Yolanda Sanchez

From: Yolanda Sanchez
Sent: Wednesday, March 1, 2017 10:28 AM
To: WebTeam
Subject: valleyair.org update: ERC Final Public Notice for J R Simplot Company; Facility# N-767, Project# N-1131840
Attachments: Final N-1131840.pdf; Newspaper.pdf; Aviso.pdf

March 1, 2017 (Facility N-767 Project N-1131840) NOTICE IS HEREBY GIVEN that the Air Pollution Control Officer has issued Emission Reduction Credits (ERCs) to J R Simplot Company for emission reductions generated by the replacement of the catalysts in the converters serving the sulfuric acid plant, at 16777 Howland Road in Lathrop, CA. The quantity of ERCs to be issued is 56,614 lb-SOx/year.

Newspaper Notice

Aviso

Public Notice Package

Aviso en Español for posting on Valleyair.org

AVISO DE DECISIÓN FINAL
PARA LA OTORGACIÓN DE
CERTIFICADOS DE REDUCCIÓN DE EMISIONES

POR EL PRESENTE SE NOTIFICA que el Oficial para el Control de la Contaminación del Aire a otorgado Certificados de Reducción de Emisiones (ERCs, por sus siglas en inglés) a J R Simplot Company por la reducción de emisiones generadas por para el reemplazo de los catalizadores en los convertidores apoderando la planta de ácido sulfúrico, en 16777 Howland Road in Lathrop, CA. La cantidad de ERCs que serán otorgados son 56,614 lb-SOx/año.

No se recibieron comentarios acerca de este proyecto despues del aviso de decisión preliminar del Distrito.

La revisión de la solicitud del Proyecto #N-1131840 está disponible para la inspección del público en http://www.valleyair.org/notices/public_notices_idx.htm, el DISTRITO PARA EL CONTROL DE LA CONTAMINACIÓN DEL AIRE DEL VALLE DE SAN JOAQUIN, 4800 ENTERPRISE WAY, MODESTO, CA 95356, y en cualquiera de las oficinas del Distrito. Para más información en Español, por favor comuníquese con el Distrito al (209) 557-6400.

NOTICE OF FINAL ACTION
FOR THE ISSUANCE OF
EMISSION REDUCTION CREDITS

NOTICE IS HEREBY GIVEN that the Air Pollution Control Officer has issued Emission Reduction Credits (ERCs) to J R Simplot Company for emission reductions generated by the replacement of the catalysts in the converters serving the sulfuric acid plant, at 16777 Howland Road in Lathrop, CA. The quantity of ERCs to be issued is 56,614 lb-SOx/year.

No comments were received following the District's preliminary decision on this project.

The application review for Project #N-1131840 is available for public inspection at http://www.valleyair.org/notices/public_notices_idx.htm, the SAN JOAQUIN VALLEY UNIFIED AIR POLLUTION CONTROL DISTRICT, 4800 ENTERPRISE WAY, MODESTO, CA 95356, and at any other District office. For additional information, please contact the District at (209) 557-6400.

San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT

Due Date
3/23/2017

Amount Due
$ 4,933.40

Amount Enclosed

ERCFEE N1131840
767 N121231 2/21/2017

RETURN THIS TOP PORTION ONLY, WITH REMITTANCE TO:

J R SIMPLOT COMPANY
PO BOX 198
LATHROP, CA 95330

SJVAPCD
4800 Enterprise Way
Modesto, CA 95356-8718

Thank You!

San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT

SJVAPCD Tax ID: 77-0262563

Facility ID	Invoice Date	Invoice Number
N767	2/21/2017	N121231

Invoice Type
Project: N1131840

J R SIMPLOT COMPANY
16777 S. HOWLAND ROAD
LATHROP, CA 95330

PROJECT NUMBER: 1131840

ENGINEERING TIME FEES	$ 4,933.40
LESS PREVIOUSLY PAID PROJECT FEES APPLIED TO THIS INVOICE	$ 0.00
PROJECT FEES DUE (Enclosed is a detailed statement outlining the fees for each item.)	**$ 4,933.40**

San Joaquin Valley Air Pollution Control District

Invoice Detail

Facility ID: N767

J R SIMPLOT COMPANY
16777 S. HOWLAND ROAD
LATHROP, CA 95330

Invoice Nbr: N121231
Invoice Date: 2/21/2017
Page: 1

Engineering Time Fees

Project Nbr	Quantity	Rate	Description	Fee
N1131840	53.2 hours	$ 107.00 /h	Standard Engineering Time	$ 5,692.40
			Less Credit For Application Filing Fees	($ 759.00)
			Standard Engineering Time SubTotal	$ 4,933.40
			Total Engineering Time Fees:	**$ 4,933.40**

Yolanda Sanchez

From: Yolanda Sanchez
Sent: Monday, March 6, 2017 11:21 AM
To: All Region (Notices_of_Permitting_Actions-All_Regions@lists.valleyair.org); North (Notices_of_Permitting_Actions-Northern_Region@lists.valleyair.org)
Subject: Public Notice on Permitting Action N-1131840

The District has posted a new permitting public notice. The public notice can be viewed on our website at: http://www.valleyair.org/notices/Docs/2017/03-01-17_(N-1131840)/Newspaper.pdf

For a list of public notices and public notice packages, please visit our website at: http://www.valleyair.org/notices/public_notices_idx.htm#PermittingandEmissionReductionCreditCertificateNotices

Thank you,

Yolanda Sanchez
Office Assistant II
SJVAPCD-Fresno
yolanda.sanchez@valleyair.org

Yolanda Sanchez

From: Yolanda Sanchez
Sent: Monday, March 6, 2017 11:23 AM
To: All Spanish (Avisos_Sobre_Acciones_de_Permisos-Todos@lists02.valleyair.org)
Subject: Aviso Publico Sobre Acciones de Permisos N-1131840

El Distrito del Aire a publicado un nuevo aviso público de permiso. El aviso público se puede ver en nuestro sitio de web en: http://www.valleyair.org/notices/Docs/2017/03-01-17_(N-1131840)/Aviso.pdf

Para obtener una lista de avisos públicos y paquetes de avisos públicos, por favor visite nuestro sitio de web en:
http://www.valleyair.org/notices/public_notices_idx.htm#PermittingandEmissionReductionCreditCertificateNotices

Gracias,

Yolanda Sanchez
Office Assistant II
SJVAPCD-Fresno
yolanda.sanchez@valleyair.org

San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT

HEALTHY AIR LIVING

MAR 0 1 2017

John Yanak
J R Simplot Company
PO Box 198
Lathrop, CA 95330-0198

RE: Notice of Final Action – Emission Reduction Credits
Facility Number: N-767
Project Number: N-1131840

Dear Mr. Yanak:

The Air Pollution Control Officer has issued Emission Reduction Credits (ERCs) to J R Simplot Company for emission reductions generated by the replacement of the catalysts in the converters serving the sulfuric acid plant, at 16777 Howland Road in Lathrop, CA. The quantity of ERCs to be issued is 56,614 lb-SOx/year.

Enclosed are the ERC Certificates and a copy of the notice of final action to be published approximately three days from the date of this letter.

Notice of the District's preliminary decision to issue the ERC Certificates was published on January 3, 2017. The District's analysis of the proposal was also sent to CARB and US EPA Region IX on December 29, 2016. No comments were received following the District's preliminary decision on this project.

Also enclosed is an invoice for the engineering evaluation fees pursuant to District Rule 3010. Please remit the amount owed, along with a copy of the attached invoice, within 60 days.

Seyed Sadredin
Executive Director/Air Pollution Control Officer

Northern Region
4800 Enterprise Way
Modesto, CA 95356-8718
Tel: (209) 557-6400 FAX: (209) 557-6475

Central Region (Main Office)
1990 E. Gettysburg Avenue
Fresno, CA 93726-0244
Tel: (559) 230-6000 FAX: (559) 230-6061

Southern Region
34946 Flyover Court
Bakersfield, CA 93308-9725
Tel: 661-392-5500 FAX: 661-392-5585

www.valleyair.org www.healthyairliving.com

Thank you for your cooperation in this matter. If you have any questions, please contact Mr. Nick Peirce at (209) 557-6400.

Sincerely,

Arnaud Marjollet
Director of Permit Services

AM:kc

Enclosures

cc: Tung Le, CARB (w/enclosure) via email
cc: Gerardo C. Rios, EPA (w/enclosure) via email

San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT

HEALTHY AIR LIVING

Northern Regional Office • 4800 Enterprise Way • Modesto, CA 95356-8718

Emission Reduction Credit Certificate
N-1250-5

ISSUED TO: J R SIMPLOT COMPANY

ISSUED DATE: February 21, 2017

LOCATION OF REDUCTION: 16777 S. HOWLAND ROAD
LATHROP, CA 95330

For SOx Reductions In The Amount Of:

Quarter 1	Quarter 2	Quarter 3	Quarter 4
10,191 lbs	18,116 lbs	16,984 lbs	11,323 lbs

Method Of Reduction

[ ] Shutdown of Entire Stationary Source
[ ] Shutdown of Emissions Units
[X] Other

Replacement of catalyst in the sulfuric acid plant converters that improved SO2 to SO3 conversion and reduced SO2 emissions (ATC N-767-9-15). THE ERCs MAY ONLY BE USED FOR EMISSION OFFSET PURPOSES AT 16777 S. HOWLAND ROAD IN LATHROP, CA (FACILITY N-767).

Use of these credits outside the San Joaquin Valley Unified Air Pollution Control District (SJVUAPCD) is not allowed without express written authorization by the SJVUAPCD.

Seyed Sadredin, Executive Director / APCO

Arnaud Marjollet, Director of Permit Services

Feb 22 2017 4:20PM – THAOSE

Kai Chan

From: Yolanda Sanchez
Sent: Wednesday, March 1, 2017 10:23 AM
To: Kai Chan
Subject: Proof of Copy: ERC FINAL PUBLIC NOTICE; J R SIMPLOT, N-1131840, STOCKTON, OrderNo: 2982662
Attachments: 770e2bb4-140b-4956-be14-22f9bd0a54d5.pdf

Importance: High

Good Morning Kai,

Attached is the proof of copy for the entitled notice. Notice will publish on 3/6/17.

Thank you,

Yolanda Sanchez
Office Assistant II
SJVAPCD-Fresno
yolanda.sanchez@valleyair.org

-----Original Message-----
From: melinda_vazquez@dailyjournal.com [mailto:melinda_vazquez@dailyjournal.com]
Sent: Wednesday, March 1, 2017 9:52 AM
To: Yolanda Sanchez
Cc: melinda_vazquez@dailyjournal.com
Subject: CNS:Documents for Reference No: ERC FINAL PUBLIC NOTICE; J R SIMPLOT, N-1131840, STOCKTON, OrderNo: 2982662
Importance: High

Attached are the following documents:

Thank you.

MELINDA_VAZQUEZ

CALIFORNIA NEWSPAPER SERVICE BUREAU

DAILY JOURNAL CORPORATION

Mailing Address : 915 E FIRST ST, LOS ANGELES, CA 90012
Telephone (213) 229-5300 / Fax (213) 229-5481
Visit us @ WWW.LEGALADSTORE.COM

YOLANDA SANCHEZ
SAN JOAQUIN VALLEY AIR POLL CONTROL DIST
1990 E. GETTYSBURG AVE.
FRESNO, CA 93726

CNS 2982662

COPY OF NOTICE

Notice Type: GPN GOVT PUBLIC NOTICE

Ad Description: ERC FINAL PUBLIC NOTICE; J R SIMPLOT, N-1131840, STOCKTON

To the right is a copy of the notice you sent to us for publication in the THE RECORD. Please read this notice carefully and call us with any corrections. The Proof of Publication will be filed with the County Clerk, if required, and mailed to you after the last date below. Publication date(s) for this notice is (are):

03/06/2017

NOTICE OF FINAL ACTION FOR THE ISSUANCE OF EMISSION REDUCTION CREDITS

NOTICE IS HEREBY GIVEN that the Air Pollution Control Officer has issued Emission Reduction Credits (ERCs) to J R Simplot Company for emission reductions generated by the replacement of the catalysts in the converters serving the sulfuric acid plant, at 16777 Howland Road in Lathrop, CA. The quantity of ERCs to be issued is 56,614 lb-SOx/year.

No comments were received following the District's preliminary decision on this project.

The application review for Project #N-1131840 is available for public inspection at http://www.valleyair.org/notices/public_notices_idx.htm, the SAN JOAQUIN VALLEY UNIFIED AIR POLLUTION CONTROL DISTRICT, 4800 ENTERPRISE WAY, MODESTO, CA 95356, and at any other District office. For additional information, please contact the District at (209) 557-6400.
3/6/17
CNS-2982662#
THE RECORD

The charge(s) for this order is as follows. An invoice will be sent after the last date of publication. If you prepaid this order in full, you will not receive an invoice.

Kai Chan

From: See Thao
Sent: Tuesday, February 21, 2017 5:23 PM
To: Kai Chan; OA-PublicNotices
Subject: RE: Final Notice for J R Simplot Company Project #N-1131840

Hello Kai,

Your notice has been received and will be processed.

Thank you,

See Thao
Operations and Support Supervisor
See.thao@valleyair.org
Phone: (559) 230-6001

HEALTHY AIR LIVING
www.healthyairliving.com
Make one change for clean air!

From: Kai Chan
Sent: Tuesday, February 21, 2017 1:44 PM
To: OA-PublicNotices
Subject: Final Notice for J R Simplot Company Project #N-1131840
Importance: High

Hello,

Attached are the final notice documents for J R Simplot Company (FID: N-767) for their ERC banking project under project #N-1131840. The final notice documents are attached as MSWord documents and the final invoice is attached as a pdf document. Please contact me with any questions.

Thank You,

Kai Chan
SJVAPCD
Permit Services, Northern Region
Phone: (209) 557-6451 / Fax: (209) 557-6475
kai.chan@valleyair.org

San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT

HEALTHY AIR LIVING

John Yanak
J R Simplot Company
PO Box 198
Lathrop, CA 95330-0198

RE: Notice of Final Action – Emission Reduction Credits
Facility Number: N-767
Project Number: N-1131840

Dear Mr. Yanak:

The Air Pollution Control Officer has issued Emission Reduction Credits (ERCs) to J R Simplot Company for emission reductions generated by the replacement of the catalysts in the converters serving the sulfuric acid plant, at 16777 Howland Road in Lathrop, CA. The quantity of ERCs to be issued is 56,614 lb-SOx/year.

Enclosed are the ERC Certificates and a copy of the notice of final action to be published approximately three days from the date of this letter.

Notice of the District's preliminary decision to issue the ERC Certificates was published on January 3, 2017. The District's analysis of the proposal was also sent to CARB and US EPA Region IX on December 29, 2016. No comments were received following the District's preliminary decision on this project.

Also enclosed is an invoice for the engineering evaluation fees pursuant to District Rule 3010. Please remit the amount owed, along with a copy of the attached invoice, within 60 days.

Seyed Sadredin
Executive Director/Air Pollution Control Officer

Northern Region
4800 Enterprise Way
Modesto, CA 95356-8718
Tel: (209) 557-6400 FAX: (209) 557-6475

Central Region (Main Office)
1990 E. Gettysburg Avenue
Fresno, CA 93726-0244
Tel: (559) 230-6000 FAX: (559) 230-6061

Southern Region
34946 Flyover Court
Bakersfield, CA 93308-9725
Tel: 661-392-5500 FAX: 661-392-5585

www.valleyair.org www.healthyairliving.com

Thank you for your cooperation in this matter. If you have any questions, please contact Mr. Nick Peirce at (209) 557-6400.

Sincerely,

Arnaud Marjollet
Director of Permit Services

AM:kc

Enclosures

cc: Tung Le, CARB (w/enclosure) via email
cc: Gerardo C. Rios, EPA (w/enclosure) via email

Stockton Record
Newspaper notice for publication in Stockton Record and for posting on valleyair.org

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NOTICE OF FINAL ACTION
FOR THE ISSUANCE OF
EMISSION REDUCTION CREDITS

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Aviso en Español for posting on Valleyair.org

AVISO DE DECISIÓN FINAL
PARA LA OTORGACIÓN DE
CERTIFICADOS DE REDUCCIÓN DE EMISIONES

POR EL PRESENTE SE NOTIFICA que el Oficial para el Control de la Contaminación del Aire a otorgado Certificados de Reducción de Emisiones (ERCs, por sus siglas en inglés) a J R Simplot Company por la reducción de emisiones generadas por para el reemplazo de los catalizadores en los convertidores apoderando la planta de ácido sulfúrico, en 16777 Howland Road in Lathrop, CA. La cantidad de ERCs que serán otorgados son 56,614 lb-SOx/año.

No se recibieron comentarios acerca de este proyecto despues del aviso de decisión preliminar del Distrito.

La revisión de la solicitud del Proyecto #N-1131840 está disponible para la inspección del público en http://www.valleyair.org/notices/public_notices_idx.htm, el DISTRITO PARA EL CONTROL DE LA CONTAMINACIÓN DEL AIRE DEL VALLE DE SAN JOAQUIN, 4800 ENTERPRISE WAY, MODESTO, CA 95356, y en cualquiera de las oficinas del Distrito. Para más información en Español, por favor comuníquese con el Distrito al (209) 557-6400.

NOTICE OF FINAL ACTION
FOR THE ISSUANCE OF
EMISSION REDUCTION CREDITS

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PUBLIC NOTICE CHECK LIST

PROJECT #: N-767 PROJECT #: N-1131840

REQST	COMPL	
√	__	ERC FINAL PUBLIC NOTICE
√	☒	Newspaper Notice Emailed to Clerical (Check box and tab to generate Notice)
√	__	Send email to "OA-PublicNotices" containing the following: SUBJECT: J R Simplot Company, N-767, N-1131840, Final Notice BODY: Emission Reduction Credit banking

ENCLOSED DOCUMENTS REQUIRE:

√	__	Enter Correct Date, Print All Documents from File and Obtain Director's Signature and District Seal Embossed on ERC Certificates
√	__	Email ***FINAL*** Newspaper Notice for Publication in Stockton Record Pub Date:_____
√	__	Mail ***FINAL*** Notice Letter to Applicant by Certified Mail including the following attachments: √ Original ERC Certificates √ Newspaper Notice
√	__	Email ***FINAL*** Public Notice package to EPA
√	__	Email ***FINAL*** Public Notice package to CARB
√	__	Email ***FINAL*** Newspaper Notice, Aviso en Español and Public Notice package to "webmaster"
√	__	After posted on website, send email with weblink of Newspaper notice, Aviso en Español, and full public notice package to: √ specific [C, S, or N] region **and** District wide permitting notification list-serves (both English and Spanish list serves) √ facility specific distribution list, (AQE – enter email address from PAS facility details notifications tab, if none enter NONE below): NONE
√	__	Mail the newspaper notice and aviso en español (NN/AE), or full public notice package (FPNP) to the persons on facility specific distribution list, as follows (entered by AQE, if none, enter NONE below): ☐NN/AE or ☐FPNP Name/address:NONE ☐NN/AE or ☐FPNP Name/address:NONE
√	__	Send ***FINAL*** Public Notice package to EDMS
√	__	Assign Mailing Date
__	__	Other Special Instructions (please specify):_____

Date Completed [DATE COMPLETED] /By Kai Chan

Newspaper notice for publication in Stockton Record and for posting on valleyair.org

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NOTICE OF FINAL ACTION
FOR THE ISSUANCE OF
EMISSION REDUCTION CREDITS

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Aviso en Español for posting on Valleyair.org

AVISO DE DECISIÓN FINAL
PARA LA OTORGACIÓN DE
CERTIFICADOS DE REDUCCIÓN DE EMISIONES

POR EL PRESENTE SE NOTIFICA que el Oficial para el Control de la Contaminación del Aire a otorgado Certificados de Reducción de Emisiones (ERCs, por sus siglas en inglés) a J R Simplot Company por la reducción de emisiones generadas por para el reemplazo de los catalizadores en los convertidores apoderando la planta de ácido sulfúrico, en 16777 Howland Road in Lathrop, CA. La cantidad de ERCs que serán otorgados son 56,614 lb-SOx/año.

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No comments were received following the District's preliminary decision on this project.

The application review for Project #N-1131840 is available for public inspection at http://www.valleyair.org/notices/public_notices_idx.htm, the SAN JOAQUIN VALLEY UNIFIED AIR POLLUTION CONTROL DISTRICT, 4800 ENTERPRISE WAY, MODESTO, CA 95356, and at any other District office. For additional information, please contact the District at (209) 557-6400.

San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT

Due Date	Amount Due
3/23/2017	$ 4,933.40

Amount Enclosed

ERCFEE N1131840
767 N121231 2/21/2017

RETURN THIS TOP PORTION ONLY, WITH REMITTANCE TO:

J R SIMPLOT COMPANY
PO BOX 198
LATHROP, CA 95330

SJVAPCD
4800 Enterprise Way
Modesto, CA 95356-8718

Thank You!

San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT

SJVAPCD Tax ID: 77-0262563

Facility ID	Invoice Date	Invoice Number
N767	2/21/2017	N121231

Invoice Type
Project: N1131840

J R SIMPLOT COMPANY
16777 S. HOWLAND ROAD
LATHROP, CA 95330

PROJECT NUMBER: 1131840

ENGINEERING TIME FEES	$ 4,933.40
LESS PREVIOUSLY PAID PROJECT FEES APPLIED TO THIS INVOICE	$ 0.00
PROJECT FEES DUE (Enclosed is a detailed statement outlining the fees for each item.)	**$ 4,933.40**

San Joaquin Valley Air Pollution Control District

Invoice Detail

Facility ID: N767

J R SIMPLOT COMPANY
16777 S. HOWLAND ROAD
LATHROP, CA 95330

Invoice Nbr: N121231
Invoice Date: 2/21/2017
Page: 1

Engineering Time Fees

Project Nbr	Quantity	Rate	Description	Fee
N1131840	53.2 hours	$ 107.00 /h	Standard Engineering Time	$ 5,692.40
			Less Credit For Application Filing Fees	($ 759.00)
			Standard Engineering Time SubTotal	$ 4,933.40
			Total Engineering Time Fees:	**$ 4,933.40**

Kai Chan

From: Nick Peirce
Sent: Friday, January 27, 2017 3:45 PM
To: Fred Cruz; Jag Kahlon; James Harader; Kai Chan; Rupi Gill; Wai-Man So
Subject: FW: EPA no comments 1/27/17
Attachments: EPA no comments 1-27-17.xlsx

FYI . . .

Nick Peirce
X:6447

From: Yannayon, Laura [mailto:Yannayon.Laura@epa.gov]
Sent: Friday, January 27, 2017 3:43 PM
To: Errol Villegas; Leonard Scandura; Nick Peirce
Subject: EPA no comments 1/27/17

Please find attached a list of proposed permits for which EPA has no comment.

Laura Yannayon
****
US EPA, Region 9 / Air Division, Permits Office (Air-3) / 75 Hawthorne St. / San Francisco, CA 94105-3901
yannayon.laura@epa.gov / (415) 972-3534 / (415) 947-3579 (fax)

"EPA is not required to re-prove the existence of the atom every time it approaches a scientific question." Coalition for Responsible Regulation v. EPA, 684 F.3d 102, 120 (D.C. Cir. 2012)

	ID	Project #
N	7478	1162753
S	3007	1153640
N	767	1131840
N	770	1152906
C	722	1152714
N	3386	1162270
C	598	1152340
S	1548	1154051

Kai Chan

From: Kai Chan
Sent: Thursday, January 26, 2017 5:00 PM
To: Tung Le (ttle@arb.ca.gov)
Subject: CARB comments regarding ERC Banking Project for J R Simplot Co. Project #N-1131840 (Facility ID: N-767)

Hello Tung,

Please let me know if CARB has any comments regarding J R Simplot Company's Emission Reduction Credits (ERC) banking project from the replacement of the catalysts in the converters serving their sulfuric acid production plant under project #N-1131840. Please note this is a re-notice of the original ERC banking project due to an EPA consent Decree (Case No. 1:15-cv-00562-CWD), which reduced the total bankable quantity of ERCs and restricted their use to their facility in Lathrop, CA. Contact me if you have any questions.

Regards,

Kai Chan
Air Quality Engineer
Permit Services, Northern Region
San Joaquin Valley Air Pollution Control District
4800Enterprise Way / Modesto, CA 95356-8718
Phone: (209) 557-6451 / Fax: (209) 557-6475
E-Mail: kai.chan@valleyair.org

Kai Chan

From: Kai Chan
Sent: Thursday, January 26, 2017 4:45 PM
To: Laura Yannayon (Yannayon.Laura@epamail.epa.gov)
Subject: EPA comments regarding SJVAPCD ERC banking project under Project #N-1131840, Facility ID: N-767

Hello Laura,

Please let me know if EPA will be submitting comments regarding District Project #N-1131840 for J R Simplot Company's (Facility ID #N-767) emission reduction credits (ERC) banking project from the replacement of the catalysts in the converters serving their sulfuric acid production plant. Please note this is a re-notice of the original ERC banking project due to an EPA consent Decree (Case No. 1:15-cv-00562-CWD), which reduced the total bankable quantity of ERCs and restricted their use to their facility in Lathrop, CA. Contact me if you have any questions.

Regards,

Kai Chan
Air Quality Engineer
Permit Services, Northern Region
San Joaquin Valley Air Pollution Control District
4800Enterprise Way / Modesto, CA 95356-8718
Phone: (209) 557-6451 / Fax: (209) 557-6475
E-Mail: kai.chan@valleyair.org

Kai Chan

From: Yolanda Sanchez
Sent: Thursday, December 29, 2016 1:55 PM
To: Kai Chan
Cc: OA-PublicNotices; Yolanda Sanchez
Subject: Proof of Copy: ERC Preliminary Public Notice, J R Simplot Company; N-1131840, Stockton, OrderNo: 2961605
Attachments: 19fe4dab-5d20-4991-b399-1db11fba5840.pdf

Importance: High

Good Afternoon Kai,

Attached is the proof of copy for the entitled PNP. Publishing on January 3, 2017.

Thank you,

Yolanda Sanchez
Office Assistant II
SJVAPCD-Fresno 559-230-6000
yolanda.sanchez@valleyair.org

-----Original Message-----
From: melinda_vazquez@dailyjournal.com [mailto:melinda_vazquez@dailyjournal.com]
Sent: Thursday, December 29, 2016 10:08 AM
To: Yolanda Sanchez
Cc: melinda_vazquez@dailyjournal.com
Subject: CNS:Documents for Reference No: ERC Preliminary Public Notice, J R Simplot Company; N-1131840, Stockton, OrderNo: 2961605
Importance: High

Attached are the following documents:

Thank you.

MELINDA_VAZQUEZ

CALIFORNIA NEWSPAPER SERVICE BUREAU

DAILY JOURNAL CORPORATION

Mailing Address : 915 E FIRST ST, LOS ANGELES, CA 90012
Telephone (213) 229-5300 / Fax (213) 229-5481
Visit us @ WWW.LEGALADSTORE.COM

Yolanda Sanchez
SAN JOAQUIN VALLEY AIR POLL CONTROL DIST
1990 E. GETTYSBURG AVE.
FRESNO, CA 93726

CNS 2961605

COPY OF NOTICE

Notice Type: GPN GOVT PUBLIC NOTICE

Ad Description: ERC Preliminary Public Notice, J R Simplot Company; N-1131840, Stockton

To the right is a copy of the notice you sent to us for publication in the THE RECORD. Please read this notice carefully and call us with any corrections. The Proof of Publication will be filed with the County Clerk, if required, and mailed to you after the last date below. Publication date(s) for this notice is (are):

01/03/2017

The charge(s) for this order is as follows. An invoice will be sent after the last date of publication. If you prepaid this order in full, you will not receive an invoice.

NOTICE OF PRELIMINARY DECISION FOR THE PROPOSED ISSUANCE OF EMISSION REDUCTION CREDITS

NOTICE IS HEREBY GIVEN that the San Joaquin Valley Unified Air Pollution Control District solicits public comment on the proposed issuance of Emission Reduction Credits to J R Simplot Company for the replacement of the catalysts in the converters serving the sulfuric acid plant, at 16777 S. Howland Road in Lathrop, CA. This project is being renoticed due to a USEPA Consent Decree (Case No. 1:15-cv-00562-CWD), which reduced the total bankable quantity of ERCs to 56,614 lb-SOx/year and restricted their use to only J R Simplot's facility in Lathrop, CA. The quantity of ERCs proposed for banking is 56,614 lb-SOx/yr.

The analysis of the regulatory basis for this proposed action, Project #N-1131840, is available for public inspection at http://www.valleyair.org/notices/public_notices_idx.htm and at any District office. For additional information, please contact the District at (209) 557-6400. Written comments on this project must be submitted by February 2, 2017 to **ARNAUD MARJOLLET, DIRECTOR OF PERMIT SERVICES, SAN JOAQUIN VALLEY UNIFIED AIR POLLUTION CONTROL DISTRICT, 4800 ENTERPRISE WAY, MODESTO, CA 95356.**
1/3/17
CNS-2961605#
THE RECORD

* A 0 0 0 0 0 4 3 1 7 2 9 6 *

Kai Chan

From: See Thao
Sent: Tuesday, December 27, 2016 9:54 AM
To: Kai Chan; OA-PublicNotices
Subject: RE: Preliminary Notice for J R Simplot Company Project #N-1131840

Thank you Kai. Notice will be processed.

Have a great day!

See Thao
Senior Office Assistant
See.thao@valleyair.org

HEALTHY AIR LIVING
www.healthyairliving.com
Make one change for clean air!

From: Kai Chan
Sent: Tuesday, December 27, 2016 9:12 AM
To: OA-PublicNotices
Subject: Preliminary Notice for J R Simplot Company Project #N-1131840

Hello,

Attached are the preliminary notice documents for J R Simplot Company (FID: N-767) for the re-notice of an ERC banking project. The revised application review is attached as a pdf document and the notice letters/documents are attached as MSWord documents. Please contact me with any questions.

Thank You,

Kai Chan
SJVAPCD
Permit Services, Northern Region
Phone: (209) 557-6451 / Fax: (209) 557-6475
kai.chan@valleyair.org

Kai Chan

From: Kai Chan
Sent: Tuesday, December 27, 2016 9:12 AM
To: OA-PublicNotices
Subject: Preliminary Notice for J R Simplot Company Project #N-1131840
Attachments: J R Simplot Company (Revised ERC Banking Application Review) N0767, 1131840.pdf; J R Simplot Co - N-767 N-1131840 (V.4) prelim-public_notice_erc_(OC_9-1....doc; Newspaper notice for publication in Stockton Record and for posting on valleyair (v.2).docx

Hello,

Attached are the preliminary notice documents for J R Simplot Company (FID: N-767) for the re-notice of an ERC banking project. The revised application review is attached as a pdf document and the notice letters/documents are attached as MSWord documents. Please contact me with any questions.

Thank You,

Kai Chan
SJVAPCD
Permit Services, Northern Region
Phone: (209) 557-6451 / Fax: (209) 557-6475
kai.chan@valleyair.org

San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT

HEALTHY AIR LIVING

John Yanak
J R Simplot Company
PO Box 198
Lathrop, CA 95330-0198

Re: Notice of Preliminary Decision – Emission Reduction Credits
Facility Number: N-767
Project Number: N-1131840

Dear Mr. Yanak:

Enclosed for your review and comment is the District's analysis of J R Simplot Company's application for Emission Reduction Credits (ERCs) resulting from the replacement of the catalysts in the converters serving the sulfuric acid plant, at 16777 S. Howland Road in Lathrop, CA. This project is being renoticed due to a USEPA Consent Decree (Case No. 1:15-cv-00562-CWD), which reduced the total bankable quantity of ERCs to 56,614 lb-SOx/year and restricted their use to only J R Simplot's facility in Lathrop, CA. The quantity of ERCs proposed for banking is 56,614 lb-SOx/yr.

The notice of preliminary decision for this project will be published approximately three days from the date of this letter. After addressing all comments made during the 30-day public notice comment period, the District intends to the issue the ERCs. Please submit your written comments on this project within the 30-day public comment period, as specified in the enclosed public notice.

Thank you for your cooperation in this matter. If you have any questions regarding this matter, please contact Mr. Kai Chan of Permit Services at (209) 557-6451.

Sincerely,

Arnaud Marjollet
Director of Permit Services

AM:kc

Enclosures

cc: Tung Le, CARB (w/enclosure) via email
cc: Gerardo C. Rios, EPA (w/enclosure) via email

Seyed Sadredin
Executive Director/Air Pollution Control Officer

Northern Region
4800 Enterprise Way
Modesto, CA 95356-8718
Tel: (209) 557-6400 FAX: (209) 557-6475

Central Region (Main Office)
1990 E. Gettysburg Avenue
Fresno, CA 93726-0244
Tel: (559) 230-6000 FAX: (559) 230-6061

Southern Region
34946 Flyover Court
Bakersfield, CA 93308-9725
Tel: 661-392-5500 FAX: 661-392-5585

www.valleyair.org www.healthyairliving.com

Stockton Record

Newspaper notice for publication in Stockton Record and for posting on valleyair.org

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NOTICE OF PRELIMINARY DECISION
FOR THE PROPOSED ISSUANCE OF
EMISSION REDUCTION CREDITS

NOTICE IS HEREBY GIVEN that the San Joaquin Valley Unified Air Pollution Control District solicits public comment on the proposed issuance of Emission Reduction Credits to J R Simplot Company for the replacement of the catalysts in the converters serving the sulfuric acid plant, at 16777 S. Howland Road in Lathrop, CA. This project is being renoticed due to a USEPA Consent Decree (Case No. 1:15-cv-00562-CWD), which reduced the total bankable quantity of ERCs to 56,614 lb-SOx/year and restricted their use to only J R Simplot's facility in Lathrop, CA. The quantity of ERCs proposed for banking is 56,614 lb-SOx/yr.

The analysis of the regulatory basis for this proposed action, Project #N-1131840, is available for public inspection at http://www.valleyair.org/notices/public_notices_idx.htm and at any District office. For additional information, please contact the District at (209) 557-6400. Written comments on this project must be submitted by [DATE] to **ARNAUD MARJOLLET, DIRECTOR OF PERMIT SERVICES, SAN JOAQUIN VALLEY UNIFIED AIR POLLUTION CONTROL DISTRICT, 4800 ENTERPRISE WAY, MODESTO, CA 95356.**

Aviso en Español for posting on Valleyair.org

AVISO DE DECISIÓN PRELIMINAR
PARA LA PROPUESTA OTORGACIÓN DE
CERTIFICADOS DE REDUCCIÓN DE EMISIONES

POR EL PRESENTE SE NOTIFICA que el Distrito Unificado para el Control de la Contaminación del Aire del Valle de San Joaquín está solicitando comentarios del público para la propuesta emisión de Certificados de Reducción de Emisiones (ERC, por sus siglas en inglés) a J R Simplot Company para el reemplazo de los catalizadores en los convertidores apoderando la planta de ácido sulfúrico en 16777 S. Howland Road in Lathrop, CA. This project is being renoticed due to a USEPA Consent Decree (Case No. 1:15-cv-00562-CWD), which reduced the total bankable quantity of ERCs to 56,614 lb-SOx/year and restricted their use to only J R Simplot's facility in Lathrop, CA. La cantidad de ERCs propuestas para almacenar son 56,614 lb-SOx/año.

El análisis de la base regulatoria para esta acción propuesta, Proyecto #N-1131840, está disponible para la inspección pública en http://www.valleyair.org/notices/public_notices_idx.htm y en cualquiera de las oficinas del Distrito. Para más información en Español, por favor comuníquese con el Distrito al (209) 557-6400. Comentarios por escrito acerca de este propuesto permiso inicial deben de ser sometidos antes del <DATE> a **ARNAUD MARJOLLET, DIRECTOR DEL DEPARTAMENTO DE PERMISOS, SAN JOAQUIN VALLEY UNIFIED AIR POLLUTION CONTROL DISTRICT, 4800 ENTERPRISE WAY, MODESTO, CA 95356.**

NOTICE OF PRELIMINARY DECISION
FOR THE PROPOSED ISSUANCE OF
EMISSION REDUCTION CREDITS

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The analysis of the regulatory basis for this proposed action, Project #N-1131840, is available for public inspection at http://www.valleyair.org/notices/public_notices_idx.htm and at any District office. For additional information, please contact the District at (209) 557-6400. Written comments on this project must be submitted by [DATE] to **ARNAUD MARJOLLET, DIRECTOR OF PERMIT SERVICES, SAN JOAQUIN VALLEY UNIFIED**

AIR POLLUTION CONTROL DISTRICT, 4800 ENTERPRISE WAY, MODESTO, CA 95356.

PUBLIC NOTICE CHECK LIST

PROJECT #: N-767 PROJECT #: N-1131840

REQST	COMPL	
√	__	ERC PRELIMINARY PUBLIC NOTICE
√	☒	Newspaper Notice Emailed to Clerical (Check box and tab to generate Notice)
√	__	Send email to "OA-PublicNotices" containing the following: SUBJECT: facility name, facility id#, project #, type of notice (prelim/final) BODY: project description and why it is being noticed (Emission Reduction Credit Banking)

ENCLOSED DOCUMENTS REQUIRE:

√	__	Enter Correct Date, Print All Documents from File and Obtain Director's Signature
√	__	Determine date comment period will end, enter date on Newspaper Notice and Aviso en Español, and Email ***PRELIMINARY*** Newspaper Notice for Publication in Stockton Record Pub Date:_____ Due Date:_____
√	__	Mail/email ***PRELIMINARY*** Notice Letter to Applicant (email address: john.yanak@simplot.com and mike.fallon@simplot.com) with the following attachments: √ Application Evaluation √ Newspaper Notice
√	__	Email ***PRELIMINARY*** Public Notice package to EPA
√	__	Email ***PRELIMINARY*** Public Notice package to CARB
√	__	Email ***PRELIMINARY*** Newspaper Notice, Aviso en Español and Public Notice package to "webmaster"
√	__	After posted on website, send email with weblink of Newspaper notice, Aviso en Español, and full public notice package to: √ specific [C, S, or N] region **and** District wide permitting notification list-serves (both English and Spanish list serves) √ facility specific distribution list, (AQE – enter email address from PAS facility details notifications tab, if none enter NONE below): NONE
√	__	Mail the newspaper notice and aviso en español (NN/AE), or full public notice package (FPNP) to the persons on facility specific distribution list, as follows (entered by AQE, if none, enter NONE below): ☐NN/AE or ☐FPNP Name/address:NONE ☐NN/AE or ☐FPNP Name/address:NONE
√	__	Send ***PRELIMINARY*** Public Notice package to EDMS
__	__	Other Special Instructions (please specify):_____

Date Completed [DATE COMPLETED] /By Kai Chan

Newspaper notice for publication in Stockton Record and for posting on valleyair.org

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NOTICE OF PRELIMINARY DECISION
FOR THE PROPOSED ISSUANCE OF
EMISSION REDUCTION CREDITS

NOTICE IS HEREBY GIVEN that the San Joaquin Valley Unified Air Pollution Control District solicits public comment on the proposed issuance of Emission Reduction Credits to J R Simplot Company for the replacement of the catalysts in the converters serving the sulfuric acid plant, at 16777 S. Howland Road in Lathrop, CA. This project is being renoticed due to a USEPA Consent Decree (Case No. 1:15-cv-00562-CWD), which reduced the total bankable quantity of ERCs to 56,614 lb-SOx/year and restricted their use to only J R Simplot's facility in Lathrop, CA. The quantity of ERCs proposed for banking is 56,614 lb-SOx/yr.

The analysis of the regulatory basis for this proposed action, Project #N-1131840, is available for public inspection at http://www.valleyair.org/notices/public_notices_idx.htm and at any District office. For additional information, please contact the District at (209) 557-6400. Written comments on this project must be submitted by [DATE] to **ARNAUD MARJOLLET, DIRECTOR OF PERMIT SERVICES, SAN JOAQUIN VALLEY UNIFIED AIR POLLUTION CONTROL DISTRICT, 4800 ENTERPRISE WAY, MODESTO, CA 95356.**

Aviso en Español for posting on Valleyair.org

AVISO DE DECISIÓN PRELIMINAR
PARA LA PROPUESTA OTORGACIÓN DE
CERTIFICADOS DE REDUCCIÓN DE EMISIONES

POR EL PRESENTE SE NOTIFICA que el Distrito Unificado para el Control de la Contaminación del Aire del Valle de San Joaquín está solicitando comentarios del público para la propuesta emisión de Certificados de Reducción de Emisiones (ERC, por sus siglas en inglés) a J R Simplot Company para el reemplazo de los catalizadores en los convertidores apoderando la planta de ácido sulfúrico en 16777 S. Howland Road in Lathrop, CA. Este proyecto está siendo notificado otra vez debido a un Decreto del Consentimiento de USEPA (Caso Numero 1:15-cv-00562-CWD), cual redujo la cantidad total de ERCs almacenables a 56,614 lb-SOx/año y restringió su uso solamente a la facilidad de J R Simplot en Lathrop, CA. La cantidad de ERCs propuestas para almacenar es 56,614 lb-SOx/año.

El análisis de la base regulatoria para esta acción propuesta, Proyecto #N-1131840, está disponible para la inspección pública en http://www.valleyair.org/notices/public_notices_idx.htm y en cualquiera de las oficinas del Distrito. Para más información en Español, por favor comuníquese con el Distrito al (209) 557-6400. Comentarios por escrito acerca de este propuesto permiso inicial deben de ser sometidos antes del <DATE> a **ARNAUD MARJOLLET, DIRECTOR DEL DEPARTAMENTO DE PERMISOS, SAN JOAQUIN VALLEY UNIFIED AIR POLLUTION CONTROL DISTRICT, 4800 ENTERPRISE WAY, MODESTO, CA 95356.**

NOTICE OF PRELIMINARY DECISION
FOR THE PROPOSED ISSUANCE OF
EMISSION REDUCTION CREDITS

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The analysis of the regulatory basis for this proposed action, Project #N-1131840, is available for public inspection at http://www.valleyair.org/notices/public_notices_idx.htm and at any District office.

For additional information, please contact the District at (209) 557-6400. Written comments on this project must be submitted by [DATE] to **ARNAUD MARJOLLET, DIRECTOR OF PERMIT SERVICES, SAN JOAQUIN VALLEY UNIFIED AIR POLLUTION CONTROL DISTRICT, 4800 ENTERPRISE WAY, MODESTO, CA 95356.**

Kai Chan

From: Ana Stone
Sent: Thursday, December 22, 2016 4:22 PM
To: Nick Peirce; Kai Chan
Cc: Jaime Holt; Heather Heinks; Maricela Velasquez
Subject: RE: Medium Priority Spanish Translation Request for ERC Banking Project #N-1131840
Attachments: J R Simplot Co - N-767 N-1131840 (V.3) prelim-public_notice_erc_(OC_9-1....doc

Here you go.

Ana R Stone
Bilingual OC Representative
Valley Air District
559.230.5851

From: Heather Heinks
Sent: Thursday, December 22, 2016 3:14 PM
To: Ana Stone
Subject: Fwd: Medium Priority Spanish Translation Request for ERC Banking Project #N-1131840

Sitting at the doc looking through email, assuming Jaime forwarded? I realized we have no translators next week.

Begin forwarded message:

> **From:** Nick Peirce <Nick.Peirce@valleyair.org>
> **Date:** December 22, 2016 at 10:56:24 AM PST
> **To:** Jaime Holt <Jaime.Holt@valleyair.org>, Heather Heinks <Heather.Heinks@valleyair.org>
> **Cc:** Kai Chan <Kai.Chan@valleyair.org>
> **Subject: FW: Medium Priority Spanish Translation Request for ERC Banking Project #N-1131840**
>
> Jaime/Heather,
> Please have staff translate the attached document to Spanish as a Medium Priority project. Thanks and I hope you have a great holiday!
>
> Nick Peirce
> X:6447
>
> ---
>
> **From:** Kai Chan
> **Sent:** Thursday, December 22, 2016 10:32 AM
> **To:** Nick Peirce
> **Subject:** Medium Priority Spanish Translation Request for ERC Banking Project #N-1131840
>
> Nick,
>
> Please forward the attached document to Outreach & Communications for J R Simplot Company's ERC banking project #N-1131840 for re-notice under **Medium Priority** for Spanish translation. The item to be translated into Spanish is highlighted in yellow in the attached document. Please contact me with any questions.

Thank You,

Kai Chan
SJVAPCD
Permit Services, Northern Region
Phone: (209) 557-6451 / Fax: (209) 557-6475
kai.chan@valleyair.org

Kai Chan

From: Nick Peirce
Sent: Thursday, December 22, 2016 10:56 AM
To: Jaime Holt; Heather Heinks
Cc: Kai Chan
Subject: FW: Medium Priority Spanish Translation Request for ERC Banking Project #N-1131840
Attachments: J R Simplot Co - N-767 N-1131840 (V.3) prelim-public_notice_erc_(OC_9-10-14).doc

Jaime/Heather,
Please have staff translate the attached document to Spanish as a Medium Priority project. Thanks and I hope you have a great holiday!

Nick Peirce
X:6447

From: Kai Chan
Sent: Thursday, December 22, 2016 10:32 AM
To: Nick Peirce
Subject: Medium Priority Spanish Translation Request for ERC Banking Project #N-1131840

Nick,

Please forward the attached document to Outreach & Communications for J R Simplot Company's ERC banking project #N-1131840 for re-notice under **Medium Priority** for Spanish translation. The item to be translated into Spanish is highlighted in yellow in the attached document. Please contact me with any questions.

Thank You,

Kai Chan
SJVAPCD
Permit Services, Northern Region
Phone: (209) 557-6451 / Fax: (209) 557-6475
kai.chan@valleyair.org

Kai Chan

From: Annette Ballatore-Williamson
Sent: Tuesday, August 18, 2015 5:00 PM
To: Nick Peirce
Cc: Arnaud Marjollet; Ryan Hayashi; John Cadrett; Lisa Middleton; Kai Chan
Subject: RE: consent decree for Simplot; Attorney-Client / Deliberative Process Privileged

Nick,

Long story short, the Consent Decree is still in the works. EPA hopes to get a final response from Simplot regarding the penalty amount by Thursday. Once the terms of the Consent Decree are agreed upon by the parties, a lawsuit will need to be initiated in U.S. District Court in Idaho, with the proposed Consent Decree filed for judicial approval. My best estimate right now is that it could take a few more months before it's wrapped up.

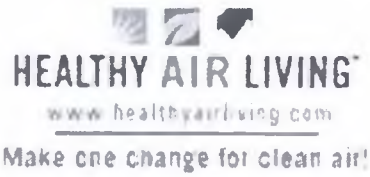
Annette

From: Annette Ballatore-Williamson
Sent: Tuesday, August 18, 2015 3:04 PM
To: Nick Peirce
Cc: Arnaud Marjollet; Ryan Hayashi; John Cadrett; Lisa Middleton; Kai Chan
Subject: RE: consent decree for Simplot; Attorney-Client / Deliberative Process Privileged

Hi Nick,

It has not been finalized. I'm following up with EPA to get a current status.

Annette Ballatore-Williamson
District Counsel
San Joaquin Valley Unified Air Pollution Control District
1990 E. Gettysburg Ave.
Fresno, CA 93726
www.valleyair.org
Tel: 559.230.6033
Fax: 559.230.6061



From: Nick Peirce
Sent: Tuesday, August 18, 2015 9:06 AM
To: Annette Ballatore-Williamson
Cc: Arnaud Marjollet; Ryan Hayashi; John Cadrett; Lisa Middleton; Kai Chan
Subject: FW: consent decree for Simplot; Attorney-Client / Deliberative Process Privileged
Importance: High

Annette,
We have an emission reduction credit banking project that cannot be finalized until this consent decree involving alleged violations at JR Simplot's sulfuric acid plants is resolved. Do you know current status of this consent decree? Has it been finalized?

Nick Peirce
Permit Services Manager - Northern Region
San Joaquin Valley Air Pollution Control District
4800 Enterprise Way
Modesto, CA 95356
(209) 557-6447 office
(209) 557-6475 fax
nick.peirce@valleyair.org

From: Kai Chan
Sent: Tuesday, August 11, 2015 3:27 PM
To: Nick Peirce
Subject: FW: consent decree for Simplot; Attorney-Client / Deliberative Process Privileged
Importance: High

Nick,

Per our mentor meeting this afternoon attached are the draft consent decree documents for J.R. Simplot. These documents were actually provided to John Cadrett by Annette of legal.

Kai Chan
SJVAPCD
Permit Services, Northern Region
Phone: (209) 557-6451 / Fax: (209) 557-6475
kai.chan@valleyair.org

From: Lisa Middleton
Sent: Tuesday, May 26, 2015 2:33 PM
To: Kai Chan; Yousif Zardo; Jessica Mohatt
Subject: FW: consent decree for Simplot; Attorney-Client / Deliberative Process Privileged

Please read John's notes about this...if we are asked anything about it we need to talk to John first before making any responses.

From: John Cadrett
Sent: Friday, May 22, 2015 10:59 AM
To: Lisa Middleton
Subject: FW: consent decree for Simplot; Attorney-Client / Deliberative Process Privileged

Lisa,

Here is the draft consent decree, parts of this are still under discussion so this is still considered a confidential document. The District is not part of the discussion, so be careful if Simplot should start asking you questions as we cannot make any commitments to the proposed final settlement.

Ultimately, the District will be a party to the final consent decree.

Please let me know if you have any questions.

From: Annette Ballatore-Williamson
Sent: Thursday, May 14, 2015 12:37 PM
To: John Cadrett; Ryan Hayashi
Subject: RE: consent decree for Simplot; Attorney-Client / Deliberative Process Privileged

Yes. I received a copy of it yesterday, attached. It is a confidential document at this point that is still in draft form.

-Annette

From: John Cadrett
Sent: Thursday, May 14, 2015 12:24 PM
To: Ryan Hayashi
Cc: Annette Ballatore-Williamson
Subject: consent decree for Simplot

Ryan,
The other day Lisa had a meeting with Simplot and they were asking her about the consent decree that apparently was recently reached with Simplot, EPA and the District. Is it possible for us to get a copy of the consent decree?

Thanks

John Cadrett
Compliance Manager, Northern Region
San Joaquin Valley Air Pollution Control District
4800 Enterprise Way
Modesto CA, 95356

John.cadrett@valleyair.org
(209) 557-6400 office
(209) 557-6475 fax

Kai Chan

From: Ackerman, Burl <burl.ackerman@Simplot.com>
Sent: Tuesday, March 24, 2015 3:33 PM
To: Kai Chan; Crets, Brian
Cc: Reesman, Chelly
Subject: RE: ERC Banking Project #N-1131840

Kai,

That is correct. We are hoping to have this resolve in the next couple of months with USEPA.

From: Kai Chan [mailto:Kai.Chan@valleyair.org]
Sent: Monday, March 23, 2015 9:47 AM
To: Crets, Brian
Cc: Reesman, Chelly; Ackerman, Burl
Subject: ERC Banking Project #N-1131840

Hello Brian,

Per our telephone conference on Jan. 26, 2015 regarding USEPA's comments for your ERC banking project form the replacement of the catalysts in the two converters serving the sulfuric acid production plant, J R Simplot Co. is awaiting the results of USEPA's enforcement action regarding your facilities before having these ERCs issued. Please confirm and contact me with any questions.

Regards,

Kai Chan
Air Quality Engineer
Permit Services, Northern Region
San Joaquin Valley Air Pollution Control District
4800Enterprise Way / Modesto, CA 95356-8718
Phone: (209) 557-6451 / Fax: (209) 557-6475
E-Mail: kai.chan@valleyair.org

TELEPHONE RECORD FORM
Project #N-1131840

Date/Time/ Initials	Names of All Persons Involved and Conversation Record
July 2, 2014 @ 1:48 PM KC	Contacted Brian Crets of J R Simplot Company at (209) 649-9344 (Cell Phone) regarding actual PSD permits issued by the USEPA to their facility in Lathrop. He was not certain and will need to speak with Chelly Reesman at their corporate office to verify. Informed him I have her phone number and will contact her myself with this question.
July 2, 2014 @ 1:53 PM KC	Called and left a voice mail message for Chelly Reesman of J R Simplot Company at (208) 389-7558 to return my call regarding PSD permits issued for the J R Simplot Company for their facility in Lathrop, CA.
July 14, 2014 @ 10:35 AM KC	Chelly Reesman of J R Simplot Company returned my voice mail message. She stated the facility in Lathrop was never issued a PSD permit by the USEPA.
Jan. 20, 2015 @ 2:30 PM KC	Called and left a voice mail message for Brian Crets (J R Simplot Co) at (209) 858-6429 to return my call to schedule a telephone conference call with me and my manager Nick Peirce to discuss USEPA's comments regarding this ERC banking project #N-1131840.
Jan. 26, 2015 @ 2:00 PM KC	Conference call with Nick Peirce (Mgr PSD North), Burl Ackerman (JR Simplot Co.), Brian Crets (JR Simplot Co.), Michael Fallon (JR Simplot Co.), Jack Burke (RTP – Consultant for JR Simplot Co.), and myself (Kai Chan) regarding comments from USEPA regarding this ERC banking project. Nick stated per USEPA's current pending enforcement action towards JR Simplot, as stated in their emailed comments letter, we could place the project on hold until resolution with EPA enforcement action or issue the ERCs with EPA's requested notation to allow revision of the ERCs after resolution of the enforcement action. Mr. Ackerman stated they are currently in negoitation with EPA regarding the enforcement actions. He will discuss this matter internally with JR Simplot and contact us afterwards regarding their proposed course of action.
Feb. 3, 2015 @ 11:07 AM KC	Contacted by Chris Gallenstein of California Air Resources Board (CARB) left a voice maile message stating that the CARB does not have any comments regarding this ERC banking project for JR Simplot Co.

Kai Chan

From: Kai Chan
Sent: Monday, February 2, 2015 10:52 AM
To: 'Le, Tung@ARB'
Subject: RE: Comments regarding ERC Banking Project for JR Simplot Co. Project N-1131840 (Facility ID: N-767)
Attachments: J R Simplot Company - ERC Banking Preliminary Notice Docs (Project #N-1131840).pdf

Hello Tung,

Attached is a copy of the public notice documents. Please contact me if you have any questions.

Regards,

Kai Chan
Air Quality Engineer
Permit Services, Northern Region
San Joaquin Valley Air Pollution Control District
4800Enterprise Way / Modesto, CA 95356-8718
Phone: (209) 557-6451 / Fax: (209) 557-6475
E-Mail: kai.chan@valleyair.org

From: Le, Tung@ARB [mailto:ttle@arb.ca.gov]
Sent: Monday, February 2, 2015 10:02 AM
To: Kai Chan
Subject: RE: Comments regarding ERC Banking Project for JR Simplot Co. Project N-1131840 (Facility ID: N-767)

Kai,

We do not have record of having received that project. Can you please forward? Thanks.

Tung

From: Kai Chan [mailto:Kai.Chan@valleyair.org]
Sent: Monday, January 26, 2015 4:09 PM
To: Le, Tung@ARB
Subject: Comments regarding ERC Banking Project for JR Simplot Co. Project N-1131840 (Facility ID: N-767)

Hello Tung,

Please let me know if CARB has any comments regarding J R Simplot Company's Emission Reduction Credits (ERCs) banking project from the replacement of the catalysts in the converters serving their sulfuric acid production plant under Project #N-1131840. Contact me if you have any questions.

Regards,

Kai Chan
Air Quality Engineer
Permit Services, Northern Region
San Joaquin Valley Air Pollution Control District
4800Enterprise Way / Modesto, CA 95356-8718
Phone: (209) 557-6451 / Fax: (209) 557-6475
E-Mail: kai.chan@valleyair.org

Kai Chan

Subject:	Ackerman 0720 (8 lines) ERC Banking Project #N-1131840
Location:	Conference Call
Start:	Mon 1/26/2015 2:00 PM
End:	Mon 1/26/2015 3:00 PM
Recurrence:	(none)
Meeting Status:	Accepted
Organizer:	Williams, Dedra

2pm PST, 3pm MST

At Simplot location
Conference Dial-in number: 0720 -
Conference Password: 072031

*****NEW SIMPLOT CELL PHONE INSTRUCTIONS*****
Location other than Simplot, but using a Simplot Cell Phone:
Conference Dial-in number: 208-327-5942
Dial 0720 when prompted –
Conference Password: 072031

Location other than Simplot or if using a cell phone
Conference Dial-in number: 1-800-551-3832
Dial 0720 when prompted –
Conference Password: 072031

+ Burl Ackerman

+ Lathrop Crew - Brian Cretz
- Mike Fallows
- RTP - ~~Chet Brooks~~
Jack Burke

Kai Chan

From: Ackerman, Burl <burl.ackerman@Simplot.com>
Sent: Friday, January 23, 2015 2:56 PM
To: Williams, Dedra
Cc: Crets, Brian; Kai Chan
Subject: FW: ERC Banking Project #N-1131840

Importance: High

Dedra,

Could you set us up a conference call number?

From: Crets, Brian
Sent: Friday, January 23, 2015 7:29 AM
To: Ackerman, Burl
Subject: FW: ERC Banking Project #N-1131840
Importance: High

Burl,

Instead of everyone calling in to my desk phone, do you think it would be better if Dedra set up the conference call where we all call into corporate?

Thanks
Brian

From: Kai Chan [mailto:Kai.Chan@valleyair.org]
Sent: Thursday, January 22, 2015 4:09 PM
To: Crets, Brian
Subject: RE: ERC Banking Project #N-1131840
Importance: High

Hello Brian,

As of today only you and Burl Ackerman are the only persons that have replied to my meeting request. Unfortunately, we will not be available on Tuesday the 27th as requested by Mr. Ackerman, so we will have to meet on Monday the 26th at 2 PM as originally proposed. We will call you at **(209) 858-6429 at 2 PM on Jan. 26** for the conference call. If that is not the correct phone number for the conference call play let me know the correct phone number. Please contact me if you have any questions.

Regards,

Kai Chan
Air Quality Engineer
Permit Services, Northern Region
San Joaquin Valley Air Pollution Control District
4800Enterprise Way / Modesto, CA 95356-8718
Phone: (209) 557-6451 / Fax: (209) 557-6475
E-Mail: kai.chan@valleyair.org

From: Crets, Brian [mailto:brian.crets@simplot.com]
Sent: Wednesday, January 21, 2015 6:44 AM
To: Kai Chan
Subject: RE: ERC Banking Project #N-1131840

Date and time works for me Kai.

Thank you
Brian

From: Kai Chan [mailto:Kai.Chan@valleyair.org]
Sent: Tuesday, January 20, 2015 5:21 PM
To: Crets, Brian
Cc: Nick Peirce; Reesman, Chelly; Ackerman, Burl; Yanak, John; 'michael.fallon@simplot.com'; Jack Burke (burke@rtpenv-nc.com) (burke@rtpenv-nc.com)
Subject: RE: ERC Banking Project #N-1131840
Importance: High

Ladies and Gentlemen,

I would like to setup a conference call to discuss USEPA's comments regarding your ERC banking project resulting from the replacement of the of the catalysts in the two converters serving the sulfuric acid production plant. Attached is a copy of USEPA's comments letter for your review. I would like to schedule the conference call for Monday Jan. 26 at 2:00 PM. Please let me know if the proposed date and time will be acceptable.

Regards.

Kai Chan
Air Quality Engineer
Permit Services, Northern Region
San Joaquin Valley Air Pollution Control District
4800Enterprise Way / Modesto, CA 95356-8718
Phone: (209) 557-6451 / Fax: (209) 557-6475
E-Mail: kai.chan@valleyair.org

From: Crets, Brian [mailto:brian.crets@simplot.com]
Sent: Tuesday, January 20, 2015 3:58 PM

To: Kai Chan
Cc: Nick Peirce; Reesman, Chelly; Ackerman, Burl; Yanak, John
Subject: RE: ERC Banking Project #N-1131840
Importance: High

Kai,

I received your phone message please include the following people for the conference call the SJVAPCD would like to set up:
Burl Ackerman - Director of Environmental - burl.ackerman@simplot.com
Chelly Reesman – Environmental Engineer Manager – michelle.reesman@simplot.com
John Yanak – California Manufacturing Manger – john.yanak@simplot.com
Brian Crets – EHS&S Manager – brian.crets@simplot.com
Mike Fallon – Environmental Engineer Lathrop – michael.fallon@simplot.com
Jack Burke - RTP Environmental Associates, Inc. – burke@rtpenv-nc.com

Thanks
Brian

From: Kai Chan [mailto:Kai.Chan@valleyair.org]
Sent: Tuesday, January 20, 2015 2:47 PM
To: Crets, Brian
Cc: Nick Peirce; Reesman, Chelly
Subject: ERC Banking Project #N-1131840

Hello Brian,

Please contact me to schedule a telephone conference call with me and my manager Nick Peirce regarding USEPA's comments for your Emission Reduction Credit (ERC) banking project resulting from the replacement of the catalysts in the two converters serving the sulfuric acid production plant.

Thank You,

Kai Chan
Air Quality Engineer
Permit Services, Northern Region
San Joaquin Valley Air Pollution Control District
4800Enterprise Way / Modesto, CA 95356-8718
Phone: (209) 557-6451 / Fax: (209) 557-6475
E-Mail: kai.chan@valleyair.org

Kai Chan

From: Kai Chan
Sent: Thursday, January 22, 2015 4:18 PM
To: 'Ackerman, Burl'
Subject: RE: ERC Banking Project #N-1131840

Importance: High

Hello Burl,

Unfortunately we will not be available for the conference call on the 27th. Therefore, we will have to schedule the conference call as originally proposed on **Jan. 26th at 2 PM**. If you would like to participate in the conference call please provide me with your phone number so we can call you for the conference. Contact me if you have any questions.

Regards,

Kai Chan
Air Quality Engineer
Permit Services, Northern Region
San Joaquin Valley Air Pollution Control District
4800Enterprise Way / Modesto, CA 95356-8718
Phone: (209) 557-6451 / Fax: (209) 557-6475
E-Mail: kai.chan@valleyair.org

From: Ackerman, Burl [mailto:burl.ackerman@Simplot.com]
Sent: Wednesday, January 21, 2015 7:30 AM
To: Kai Chan; Crets, Brian
Cc: Nick Peirce; Reesman, Chelly; Yanak, John; 'michael.fallon@simplot.com'; Jack Burke (burke@rtpenv-nc.com) (burke@rtpenv-nc.com)
Subject: RE: ERC Banking Project #N-1131840

Kai,

The 27th would work better for me, but I will make the 26th work if need be.

From: Kai Chan [mailto:Kai.Chan@valleyair.org]
Sent: Tuesday, January 20, 2015 6:21 PM
To: Crets, Brian
Cc: Nick Peirce; Reesman, Chelly; Ackerman, Burl; Yanak, John; 'michael.fallon@simplot.com'; Jack Burke (burke@rtpenv-nc.com) (burke@rtpenv-nc.com)
Subject: RE: ERC Banking Project #N-1131840
Importance: High

Ladies and Gentlemen,

I would like to setup a conference call to discuss USEPA's comments regarding your ERC banking project resulting from the replacement of the of the catalysts in the two converters serving the sulfuric acid production plant. Attached is a copy of USEPA's comments letter for your review. I would like to schedule the conference call for Monday Jan. 26 at 2:00 PM. Please let me know if the proposed date and time will be acceptable.

Regards.

Kai Chan
Air Quality Engineer
Permit Services, Northern Region
San Joaquin Valley Air Pollution Control District
4800Enterprise Way / Modesto, CA 95356-8718
Phone: (209) 557-6451 / Fax: (209) 557-6475
E-Mail: kai.chan@valleyair.org

From: Crets, Brian [mailto:brian.crets@simplot.com]
Sent: Tuesday, January 20, 2015 3:58 PM
To: Kai Chan
Cc: Nick Peirce; Reesman, Chelly; Ackerman, Burl; Yanak, John
Subject: RE: ERC Banking Project #N-1131840
Importance: High

Kai,

I received your phone message please include the following people for the conference call the SJVAPCD would like to set up:
Burl Ackerman - Director of Environmental - burl.ackerman@simplot.com
Chelly Reesman – Environmental Engineer Manager – michelle.reesman@simplot.com
John Yanak – California Manufacturing Manger – john.yanak@simplot.com
Brian Crets – EHS&S Manager – brian.crets@simplot.com
Mike Fallon – Environmental Engineer Lathrop – michael.fallon@simplot.com
Jack Burke - RTP Environmental Associates, Inc. – burke@rtpenv-nc.com

Thanks
Brian

From: Kai Chan [mailto:Kai.Chan@valleyair.org]
Sent: Tuesday, January 20, 2015 2:47 PM
To: Crets, Brian
Cc: Nick Peirce; Reesman, Chelly
Subject: ERC Banking Project #N-1131840

Hello Brian,

Please contact me to schedule a telephone conference call with me and my manager Nick Peirce regarding USEPA's comments for your Emission Reduction Credit (ERC) banking project resulting from the replacement of the catalysts in the two converters serving the sulfuric acid production plant.

Thank You,

Kai Chan
Air Quality Engineer
Permit Services, Northern Region
San Joaquin Valley Air Pollution Control District
4800Enterprise Way / Modesto, CA 95356-8718
Phone: (209) 557-6451 / Fax: (209) 557-6475
E-Mail: kai.chan@valleyair.org

Kai Chan

From: Kai Chan
Sent: Thursday, January 22, 2015 4:09 PM
To: 'Crets, Brian'
Subject: RE: ERC Banking Project #N-1131840

Importance: High

Hello Brian,

As of today only you and Burl Ackerman are the only persons that have replied to my meeting request. Unfortunately, we will not be available on Tuesday the 27th as requested by Mr. Ackerman, so we will have to meet on Monday the 26th at 2 PM as originally proposed. We will call you at **(209) 858-6429 at 2 PM on Jan. 26** for the conference call. If that is not the correct phone number for the conference call play let me know the correct phone number. Please contact me if you have any questions.

Regards,

Kai Chan
Air Quality Engineer
Permit Services, Northern Region
San Joaquin Valley Air Pollution Control District
4800Enterprise Way / Modesto, CA 95356-8718
Phone: (209) 557-6451 / Fax: (209) 557-6475
E-Mail: kai.chan@valleyair.org

From: Crets, Brian [mailto:brian.crets@simplot.com]
Sent: Wednesday, January 21, 2015 6:44 AM
To: Kai Chan
Subject: RE: ERC Banking Project #N-1131840

Date and time works for me Kai.

Thank you
Brian

From: Kai Chan [mailto:Kai.Chan@valleyair.org]
Sent: Tuesday, January 20, 2015 5:21 PM
To: Crets, Brian
Cc: Nick Peirce; Reesman, Chelly; Ackerman, Burl; Yanak, John; 'michael.fallon@simplot.com'; Jack Burke (burke@rtpenv-nc.com) (burke@rtpenv-nc.com)
Subject: RE: ERC Banking Project #N-1131840
Importance: High

Ladies and Gentlemen,

I would like to setup a conference call to discuss USEPA's comments regarding your ERC banking project resulting from the replacement of the of the catalysts in the two converters serving the sulfuric acid production plant. Attached is a copy of USEPA's comments letter for your review. I would like to schedule the conference call for Monday Jan. 26 at 2:00 PM. Please let me know if the proposed date and time will be acceptable.

Regards.

Kai Chan
Air Quality Engineer
Permit Services, Northern Region
San Joaquin Valley Air Pollution Control District
4800Enterprise Way / Modesto, CA 95356-8718
Phone: (209) 557-6451 / Fax: (209) 557-6475
E-Mail: kai.chan@valleyair.org

From: Crets, Brian [mailto:brian.crets@simplot.com]
Sent: Tuesday, January 20, 2015 3:58 PM
To: Kai Chan
Cc: Nick Peirce; Reesman, Chelly; Ackerman, Burl; Yanak, John
Subject: RE: ERC Banking Project #N-1131840
Importance: High

Kai,

I received your phone message please include the following people for the conference call the SJVAPCD would like to set up:
Burl Ackerman - Director of Environmental - burl.ackerman@simplot.com
Chelly Reesman – Environmental Engineer Manager – michelle.reesman@simplot.com
John Yanak – California Manufacturing Manger – john.yanak@simplot.com
Brian Crets – EHS&S Manager – brian.crets@simplot.com
Mike Fallon – Environmental Engineer Lathrop – michael.fallon@simplot.com
Jack Burke - RTP Environmental Associates, Inc. – burke@rtpenv-nc.com

Thanks
Brian

From: Kai Chan [mailto:Kai.Chan@valleyair.org]
Sent: Tuesday, January 20, 2015 2:47 PM
To: Crets, Brian
Cc: Nick Peirce; Reesman, Chelly
Subject: ERC Banking Project #N-1131840

Hello Brian,

Please contact me to schedule a telephone conference call with me and my manager Nick Peirce regarding USEPA's comments for your Emission Reduction Credit (ERC) banking project resulting from the replacement of the catalysts in the two converters serving the sulfuric acid production plant.

Thank You,

Kai Chan
Air Quality Engineer
Permit Services, Northern Region
San Joaquin Valley Air Pollution Control District
4800Enterprise Way / Modesto, CA 95356-8718
Phone: (209) 557-6451 / Fax: (209) 557-6475
E-Mail: kai.chan@valleyair.org

HEALTHY AIR LIVING

www.healthyairliving.com

Make one change for clean air!

Kai Chan

From: Kai Chan
Sent: Tuesday, January 20, 2015 2:47 PM
To: Crets, Brian (brian.crets@simplot.com)
Cc: Nick Peirce; Reesman, Chelly (michelle.reesman@simplot.com)
Subject: ERC Banking Project #N-1131840

Hello Brian,

Please contact me to schedule a telephone conference call with me and my manager Nick Peirce regarding USEPA's comments for your Emission Reduction Credit (ERC) banking project resulting from the replacement of the catalysts in the two converters serving the sulfuric acid production plant.

Thank You,

Kai Chan
Air Quality Engineer
Permit Services, Northern Region
San Joaquin Valley Air Pollution Control District
4800Enterprise Way / Modesto, CA 95356-8718
Phone: (209) 557-6451 / Fax: (209) 557-6475
E-Mail: kai.chan@valleyair.org

Kai Chan

From: Kai Chan
Sent: Friday, January 16, 2015 9:40 AM
To: Nick Peirce
Subject: RE: EPA comments for Project N-1131840 ERCs for JR Simplot

Nick,

Thank you for the update. At this time JR Simplot has not contacted me regarding the ERCs. I'll wait to hear from you after your discussion with Arnaud and Dave before contacting JR Simplot regarding EPA's comments.

Thank You, Kai

From: Nick Peirce
Sent: Friday, January 16, 2015 9:27 AM
To: Kai Chan
Subject: FW: EPA comments for Project N-1131840 ERCs for JR Simplot

FYI . . . . I will try to discuss this with Arnaud and/or Dave, pending their availability.

If Simplot needs a status update immediately, I think Dave's direction is clear enough to communicate to them.

Nick Peirce
X:6447

From: Dave Warner
Sent: Monday, December 29, 2014 11:34 AM
To: Arnaud Marjollet; Nick Peirce
Subject: RE: EPA comments for Project N-1131840 ERCs for JR Simplot

Let's discuss. EPA's proposed action means that the ERCs are essentially worthless until the NOV is resolved with EPA, so I'd rather work with Simplot to hold the application in abeyance until EPA and Simplot resolve their issue, and then the ERC can be issued as final.

If Simplot isn't interested in that approach, we can do what EPA is asking.

Dave Warner
Deputy Air Pollution Control Officer
San Joaquin Valley APCD

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Make one change for clean air!

From: Yannayon, Laura [mailto:Yannayon.Laura@epa.gov]
Sent: Friday, December 19, 2014 12:55 PM
To: Arnaud Marjollet; Nick Peirce

Cc: mtollstr@arb.ca.gov; Salazar, Matt
Subject: EPA comments for Project N-1131840 ERCs for JR Simplot

Hi Arnaud,

Please find attached EPA's comments in regards to the proposed notice to issue ERC's to the JR Simplot facility. Please feel free to call if you have any questions.

Also, please note that today, 12/19 will be my last day in the office until 1/5/15. I hope that you enjoy the holidays with your family and friends!

Laura Yannayon
****
US EPA, Region 9 / Air Division, Permits Office (Air-3) / San Francisco, CA 94105-3901
yannayon.laura@epa.gov / (415) 972-3534 / (415) 947-3579 (fax)

"EPA is not required to re-prove the existence of the atom every time it approaches a scientific question." Coalition for Responsible Regulation v. EPA, 684 F.3d 102, 120 (D.C. Cir. 2012)

Kai Chan

From: Cherie Clark
Sent: Tuesday, January 13, 2015 2:07 PM
To: Nick Peirce; Kai Chan
Cc: Arnaud Marjollet
Subject: Simplot Facility # N-767 Project # N-1131840
Attachments: 4544_001.pdf

Importance: High

Gentlemen:

I received this in today's mail and wanted to forward it to you. I will forward the original to Arnaud as well.

Thank you,

Cherie Clark
Air Quality Technician
Permits
San Joaquin Valley APCD
1990 E. Gettysburg Ave.
Fresno, CA 93726
559-230-5940

*Service*Teamwork*Attitude*Respect*

From: Centralcopier
Sent: Tuesday, January 13, 2015 1:59 PM
To: Cherie Clark
Subject: Attached Image

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105-3901

December 19, 2014

Arnaud Marjollet
Director of Permit Services
San Joaquin Valley Air Pollution Control District
1990 E. Gettysburg Avenue
Fresno, California 93726-0244

Re: Notice of Preliminary Decision – Emission Reduction Credits
District Facility # N-767
Project# N-1131840

Dear Mr. Marjollet,

Thank you for the opportunity to provide comments on your December 2, 2014 Preliminary Decision to issue Emission Reduction Credits (ERC) to J. R. Simplot facility (the "Facility"), located at 16777 S. Howland Road, Lathrop, CA. The proposed ERCs are based on reductions which occurred due to the replacement of the catalysts in the converters (R-301 and R-201).

On December 3, 2013, the U.S. Environmental Projection Agency issued a Notice of Violation (NOV) to Simplot, alleging violations of the Prevention of Significant Deterioration (PSD) requirements of the federal Clean Air Act at the Facility. Depending on the final resolution of such PSD liability at the Facility, EPA believes that emissions reductions proposed for credit in this application resulting from the modifications may not qualify as "surplus" due to this enforcement action. Therefore, any banking of these emissions reductions should be restricted with a notation that such emissions reductions are not reflective of any adjustments that may be required as a result of PSD enforcement actions at the Facility. In the event that such a finding is made, this will provide a basis for reopening the ERC certificate to restrict, remove or reduce the total banked emissions to reflect the final resolution of the NOV.

If you have any questions, please contact Ms. Laura Yannayon at (415) 972-3534.

Sincerely,

Gerardo C. Rios
Chief, Permits Office
EPA Region IX

cc:
Mike Tollstrup, ARB
Matt Salazar, EPA Region 9 Enforcement Division

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105-3901

December 19, 2014

Arnaud Marjollet
Director of Permit Services
San Joaquin Valley Air Pollution Control District
1990 E. Gettysburg Avenue
Fresno, California 93726-0244

Re: Notice of Preliminary Decision – Emission Reduction Credits
District Facility # N-767
Project# N-1131840

Dear Mr. Marjollet,

Thank you for the opportunity to provide comments on your December 2, 2014 Preliminary Decision to issue Emission Reduction Credits (ERC) to J. R. Simplot facility (the "Facility"), located at 16777 S. Howland Road, Lathrop, CA. The proposed ERCs are based on reductions which occurred due to the replacement of the catalysts in the converters (R-301 and R-201).

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If you have any questions, please contact Ms. Laura Yannayon at (415) 972-3534.

Sincerely,

Gerardo C. Rios
Chief, Permits Office
EPA Region IX

cc:
Mike Tollstrup, ARB
Matt Salazar, EPA Region 9 Enforcement Division

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105-3901

December 19, 2014

Arnaud Marjollet
Director of Permit Services
San Joaquin Valley Air Pollution Control District
1990 E. Gettysburg Avenue
Fresno, California 93726-0244

Re: Notice of Preliminary Decision – Emission Reduction Credits
District Facility # N-767
Project# N-1131840

Dear Mr. Marjollet,

Thank you for the opportunity to provide comments on your December 2, 2014 Preliminary Decision to issue Emission Reduction Credits (ERC) to J. R. Simplot facility (the "Facility"), located at 16777 S. Howland Road, Lathrop, CA. The proposed ERCs are based on reductions which occurred due to the replacement of the catalysts in the converters (R-301 and R-201).

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If you have any questions, please contact Ms. Laura Yannayon at (415) 972-3534.

Sincerely,

Gerardo C. Rios
Chief, Permits Office
EPA Region IX

cc:
Mike Tollstrup, ARB
Matt Salazar, EPA Region 9 Enforcement Division

Kai Chan

From: Yolanda Alvarez
Sent: Tuesday, December 02, 2014 9:11 AM
To: Kai Chan
Subject: Proof of Copy: ERC PRELIMINARY PUBLIC NOTICE; JR SIMPLOT COMPANY; PROJECT# N-1131840, STOCKTON, OrderNo: 2694537
Attachments: 34515d70-b386-4fdc-9e70-29c4b7198ebf.pdf

Importance: High

Good Morning Kai,

Attached is your proof of copy for the entitled notice. Notice will print on Friday December 5, 2014.

Thank you,

Yolanda R. Alvarez

-----Original Message-----
From: liliana_Moreno@dailyjournal.com [mailto:liliana_Moreno@dailyjournal.com]
Sent: Tuesday, December 02, 2014 9:08 AM
To: Yolanda Alvarez
Cc: liliana_Moreno@dailyjournal.com
Subject: CNS:Documents for Reference No: ERC PRELIMINARY PUBLIC NOTICE; JR SIMPLOT COMPANY; PROJECT# N-1131840, STOCKTON, OrderNo: 2694537
Importance: High

Attached are the following documents:

Thank you.

Liliana_Cueva

CALIFORNIA NEWSPAPER SERVICE BUREAU

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Mailing Address : 915 E FIRST ST, LOS ANGELES, CA 90012
Telephone (213) 229-5300 / Fax (213) 229-5481
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YOLANDA
SAN JOAQUIN VALLEY AIR POLL CONTROL DIST
1990 E. GETTYSBURG AVE.
FRESNO, CA 93726

COPY OF NOTICE

Notice Type: GPN GOVT PUBLIC NOTICE

Ad Description ERC PRELIMINARY PUBLIC NOTICE; JR SIMPLOT

To the right is a copy of the notice you sent to us for publication in the THE RECORD. Please read this notice carefully and call us with any corrections. The Proof of Publication will be filed with the County Clerk, if required, and mailed to you after the last date below. Publication date(s) for this notice is (are):

12/05/2014

CNS 2694537

NOTICE OF PRELIMINARY DECISION FOR THE PROPOSED ISSUANCE OF EMISSION REDUCTION CREDITS

NOTICE IS HEREBY GIVEN that the San Joaquin Valley Unified Air Pollution Control District solicits public comment on the proposed issuance of Emission Reduction Credits to J R Simplot Company for the replacement of the catalysts in the converters serving the sulfuric acid plant, at 16777 S. Howland Road in Lathrop, CA. The quantity of ERCs proposed for banking is 113,227 lb-SOx/year.
The analysis of the regulatory basis for this proposed action, Project #N-1131840, is available for public inspection at http://www.valleyair.org/notices/public_notices_idx.htm and at any District office. For additional information, please contact the District at (209) 557-6400. Written comments on this project must be submitted by January 5, 2015 to **ARNAUD MARJOLLET, DIRECTOR OF PERMIT SERVICES, SAN JOAQUIN VALLEY UNIFIED AIR POLLUTION CONTROL DISTRICT, 4800 ENTERPRISE WAY, MODESTO, CA 95356.**
12/5/14
CNS-2694537#
THE RECORD

Kai Chan

From: Yolanda Alvarez
Sent: Monday, December 01, 2014 8:00 AM
To: Kai Chan; OA-PublicNotices
Subject: RE: Preliminary Notice for J R Simplot Company, Project #N-1131840

Good Morning Kai,

Notice is received and will be processed.

Thank you,

Yolanda R. Alvarez

From: Kai Chan
Sent: Monday, December 01, 2014 7:56 AM
To: OA-PublicNotices
Subject: Preliminary Notice for J R Simplot Company, Project #N-1131840

Hello,

Attached are the preliminary notice documents for J R Simplot Company (FID N-767) for an ERC banking project. The application review is attached as a pdf document and the notice letters are attached as MSWord documents. Please contact me with any questions.

Regards,

Kai Chan
SJVAPCD
Permit Services, Northern Region
Phone: (209) 557-6451 / Fax: (209) 557-6475
kai.chan@valleyair.org

Kai Chan

From: Kai Chan
Sent: Friday, November 21, 2014 3:11 PM
To: Nick Peirce
Subject: Medium Priority Spanish Transllation Request for ERC Banking Project #N-1131840
Attachments: J R Simplot Co. - N-767, N-1131840, prelim-public_notice_erc_(OC_9-10-14).doc

Importance: High

Nick,

Please forward the attached document to Outreach & Communications for J R Simplot Company's ERC banking project #N-1131840 under **Medium Priority** for Spanish translation. The item to be translated into Spanish is highlight in yellow in the attached document. Please contact me with any questions.

Thank You,

Kai Chan
SJVAPCD
Permit Services, Northern Region
Phone: (209) 557-6451 / Fax: (209) 557-6475
kai.chan@valleyair.org

San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT

HEALTHY AIR LIVING

John Yanak
J R Simplot Company
P.O. Box 198
Lathrop, CA 95330-0198

Re: Notice of Preliminary Decision – Emission Reduction Credits
Facility Number: N-767
Project Number: N-1131840

Dear Mr. Yanak:

Enclosed for your review and comment is the District's analysis of J R Simplot Company's application for Emission Reduction Credits (ERCs) resulting from the replacement of the catalysts in the converters serving the sulfuric acid plant, at 16777 S. Howland Road in Lathrop, CA. The quantity of ERCs proposed for banking is 113,227 lb-SOx/year.

The notice of preliminary decision for this project will be published approximately three days from the date of this letter. After addressing all comments made during the 30-day public notice comment period, the District intends to the issue the ERCs. Please submit your written comments on this project within the 30-day public comment period, as specified in the enclosed public notice.

Thank you for your cooperation in this matter. If you have any questions regarding this matter, please contact Mr. Kai Chan of Permit Services at (209) 557- 6451.

Sincerely,

Arnaud Marjollet
Director of Permit Services

AM:kc

Enclosures

cc: Mike Tollstrup, CARB (w/enclosure) via email
cc: Gerardo C. Rios, EPA (w/enclosure) via email

Seyed Sadredin
Executive Director/Air Pollution Control Officer

Northern Region
4800 Enterprise Way
Modesto, CA 95356-8718
Tel: (209) 557-6400 FAX: (209) 557-6475

Central Region (Main Office)
1990 E. Gettysburg Avenue
Fresno, CA 93726-0244
Tel: (559) 230-6000 FAX: (559) 230-6061

Southern Region
34946 Flyover Court
Bakersfield, CA 93308-9725
Tel: 661-392-5500 FAX: 661-392-5585

www.valleyair.org www.healthyairliving.com

Stockton Record
Newspaper notice for publication in Stockton Record and for posting on valleyair.org

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NOTICE OF PRELIMINARY DECISION
FOR THE PROPOSED ISSUANCE OF
EMISSION REDUCTION CREDITS

NOTICE IS HEREBY GIVEN that the San Joaquin Valley Unified Air Pollution Control District solicits public comment on the proposed issuance of Emission Reduction Credits to J R Simplot Company for the replacement of the catalysts in the converters serving the sulfuric acid plant, at 16777 S. Howland Road in Lathrop, CA. The quantity of ERCs proposed for banking is 113,227 lb-SOx/year.

The analysis of the regulatory basis for this proposed action, Project #N-1131840, is available for public inspection at http://www.valleyair.org/notices/public_notices_idx.htm and at any District office. For additional information, please contact the District at (209) 557-6400. Written comments on this project must be submitted by [DATE] to **ARNAUD MARJOLLET, DIRECTOR OF PERMIT SERVICES, SAN JOAQUIN VALLEY UNIFIED AIR POLLUTION CONTROL DISTRICT, 4800 ENTERPRISE WAY, MODESTO, CA 95356.**

Aviso en Español for posting on Valleyair.org

AVISO DE DECISIÓN PRELIMINAR
PARA LA PROPUESTA OTORGACIÓN DE
CERTIFICADOS DE REDUCCIÓN DE EMISIONES

POR EL PRESENTE SE NOTIFICA que el Distrito Unificado para el Control de la Contaminación del Aire del Valle de San Joaquín está solicitando comentarios del público para la propuesta emisión de Certificados de Reducción de Emisiones (ERC, por sus siglas en inglés) a J R Simplot Company para replacement of the catalysts in the converters serving the sulfuric acid production plant (SPANISH), en 16777 S. Howland Road in Lathrop, CA. La cantidad de ERCs propuestas para almacenar es 113,227 lb-SOx/año.

El análisis de la base regulatoria para esta acción propuesta, Proyecto #N-1131840, está disponible para la inspección pública en http://www.valleyair.org/notices/public_notices_idx.htm y en cualquiera de las oficinas del Distrito. Para más información en Español, por favor comuníquese con el Distrito al (209) 557-6400. Comentarios por escrito acerca de este propuesto permiso inicial deben de ser sometidos antes del <DATE> a **ARNAUD MARJOLLET, DIRECTOR DEL DEPARTAMENTO DE PERMISOS, SAN JOAQUIN VALLEY UNIFIED AIR POLLUTION CONTROL DISTRICT, 4800 ENTERPRISE WAY, MODESTO, CA 95356.**

NOTICE OF PRELIMINARY DECISION
FOR THE PROPOSED ISSUANCE OF
EMISSION REDUCTION CREDITS

NOTICE IS HEREBY GIVEN that the San Joaquin Valley Unified Air Pollution Control District solicits public comment on the proposed issuance of Emission Reduction Credits to J R Simplot Company for the replacement of the catalysts in the converters serving the sulfuric acid plant, at 16777 S. Howland Road in Lathrop, CA. The quantity of ERCs proposed for banking is 113,227 lb-SOx/year.

The analysis of the regulatory basis for this proposed action, Project #N-1131840, is available for public inspection at http://www.valleyair.org/notices/public_notices_idx.htm and at any District office. For additional information, please contact the District at (209) 557-6400. Written comments on this project must be submitted by [DATE] to **ARNAUD MARJOLLET, DIRECTOR OF PERMIT SERVICES, SAN JOAQUIN VALLEY UNIFIED AIR POLLUTION CONTROL DISTRICT, 4800 ENTERPRISE WAY, MODESTO, CA 95356.**

PUBLIC NOTICE CHECK LIST

PROJECT #: N-767 PROJECT #: N-1131840

REQST	COMPL	
√	__	ERC PRELIMINARY PUBLIC NOTICE
√	☐	Newspaper Notice Emailed to Clerical (Check box and tab to generate Notice)
√	__	Send email to "OA-PublicNotices" containing the following: SUBJECT: J R Simplot Company, N-767, N-1131840, prelim BODY: Emission Reduction Credit Banking for SOx emissions from the replacement of the catalysts in the converters serving the sulfuric acid plant

ENCLOSED DOCUMENTS REQUIRE:

√ __	Enter Correct Date, Print All Documents from File and Obtain Director's Signature
√ __	Determine date comment period will end, enter date on Newspaper Notice and Aviso en Español, and Email ***PRELIMINARY*** Newspaper Notice for Publication in Stockton Record Pub Date:_____ Due Date:_____
√ __	Mail/email ***PRELIMINARY*** Notice Letter to Applicant (email address: john.yanak@simplot.com) with the following attachments: √ Application Evaluation √ Newspaper Notice
√ __	Email ***PRELIMINARY*** Public Notice package to EPA
√ __	Email ***PRELIMINARY*** Public Notice package to CARB
√ __	Email ***PRELIMINARY*** Newspaper Notice, Aviso en Español and Public Notice package to "webmaster"
√ __	After posted on website, send email with weblink of Newspaper notice, Aviso en Español, and full public notice package to: √ specific [C, S, or N] region **and** District wide permitting notification list-serves (both English and Spanish list serves) √ facility specific distribution list, (AQE – enter email address from PAS facility details notifications tab, if none enter NONE below): None
√ __	Mail the newspaper notice and aviso en español (NN/AE), or full public notice package (FPNP) to the persons on facility specific distribution list, as follows (entered by AQE, if none, enter NONE below): ☐NN/AE or ☐FPNP Name/address:None ☐NN/AE or ☐FPNP Name/address:None
√ __	Send ***PRELIMINARY*** Public Notice package to EDMS
__ __	Other Special Instructions (please specify):_____

Date Completed [DATE COMPLETED] /By Kai Chan

Kai Chan

From: Ackerman, Burl <burl.ackerman@Simplot.com>
Sent: Friday, August 1, 2014 1:11 PM
To: Kai Chan
Cc: Jack Burke (burke@rtpenv-nc.com)
Subject: EPA Comments Responses 2014-08-14.docx
Attachments: EPA Comments Responses 2014-08-14.docx

Kai,

See attached our response to EPA's comments on the SO2 reduction project. Let me know if you would like to have a call to discuss.

EPA Comment:

On page 15 of the evaluation, as part of the emission calculations to determine if the project results in a Federal Major Modification (FMM), the evaluation states that the listed revisions do "not result in an increase in design capacity. . . and will not allow the sulfuric acid plant to operate at a higher utilization rate." The evaluation continues by explaining that the listed revisions will not increase design capacity. This is not the correct evaluation criteria. If a project will result in "restored" capacity, then that capacity cannot be subtracted as "unused baseline capacity" because it was not available for use. The emissions related to restored capacity are considered emission increases for the purposes of determining whether a project will result in a FMM. Please revise this portion of the evaluation as necessary to calculate the quantity of emissions due to restored capacity; and determine if this increase will result in a FMM for SO_2.

Simplot Response:

Below is an excerpt from Simplot's May 2013 ATC permit application. It describes the impact of the planned project on production capacity and unused baseline capacity emissions:

The following discussion provides a description of the calculation methodology used to estimate unused baseline capacity emissions including example calculations. These estimates are all based on the underlying estimate that the various equipment repair and replacement activities that Simplot is planning will result in a reduction in unscheduled downtime of as much as 0.6%, which equates to a project-related increase in projected annual sulfuric acid production of 1,211 T/yr. The projected decrease in unscheduled downtime compares to a total unscheduled downtime of about 2.9% during the baseline period, and thus, it represents about a 20% reduction in unscheduled downtime estimated to result from the project. Note also that the project is not specifically being implemented to reduce downtime. Instead, Simplot anticipates that some of the repairs and replacements that are planned will have the consequence of reducing or eliminating some downtime. A 20% reduction in unplanned downtime attributable to the planned replacements is thus believed to be conservative.[1]

The "restored" capacity referred to by EPA in its comment is reflected in Simplot's estimate of unscheduled downtime avoidance of 0.6%, which equates to nearly two days per year of restored capacity at 100% production. On a short-term basis (*i.e.*, on a daily or weekly basis), the capacity of the Lathrop plant to produce at its design rate was not impaired during the baseline period. The issue addressed by Simplot in its analysis of unused baseline capacity is that the Lathrop catalyst replacement project was projected to avoid slowdowns or shutdowns for unplanned maintenance that might otherwise occur. This possible impact on projected

[1] See page 23 of Simplot's May 2013 ATC permit application.

production was accounted for in the analysis of whether the project constituted a federal major modification.

Further, because projected actual emissions of SO_2 from the Lathrop plant are less than the baseline actual emissions, no unused baseline capacity emissions associated with this pollutant were subtracted from projected actual emissions in the FMM emissions increase analysis. That is, the project will result in a decrease in SO_2 emissions regardless of the amount of "restored" capacity one attributes to the project – even if it is 100% of the difference between the baseline actual production rate and 100% of the Lathrop plant's capacity. Baseline actual SO_2 emissions are 268.2 tons per year and post-project projected actual SO_2 emissions are 199.9 tons per year resulting in an emissions decrease of over 68 tons per year.

EPA Comment:

On page 16 of the evaluation, the table incorrectly states that the potential to emit from the new and modified emission units (205.25 tons per year (tpy)) does not exceed the 40 tpy threshold. Please revise accordingly. The text that follows evaluates whether the project will result in a significant emission increase. This evaluation contains the same error described above based on no increase in design capacity. Please revise this portion of the evaluation as necessary to calculate the quantity of emissions due to restored capacity; and determine if this increase will result in a significant emissions increase of SO_2.

Simplot Response:

See above response. The post-project potential SO_2 emissions of 205.25 tons per year are less than the pre-project baseline actual emissions of 268.2 tons per year, resulting in an emissions decrease from the project.

San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT

COPY

HEALTHY AIR LIVING™

June 5, 2014

John Yanak
J R Simplot Company
P.O. Box 198
Lathrop, CA 95330-0198

Re: Notice of Receipt of Complete Application - Emission Reduction Credits Banking
Facility Number: N-767
Project Number: N-1131840

Dear Mr. Yanak:

The District has completed a preliminary review of your application for Emission Reduction Credits (ERCs) Banking resulting from Emission Reduction Credits (ERCs) for SOx emissions resulting from the replacement of the catalysts in the converters serving the sulfuric acid plant under ATC permit N-767-9-15 at 16777 S. Howland Road in Lathrop, CA.

Based on this preliminary review, the application appears to be complete. However, during processing of your application, the District may request additional information to clarify, correct, or otherwise supplement, the information on file.

Pursuant to District Rule 3060, your application may be subject to an hourly Engineering Evaluation Fee. If the applicable fees exceed the submitted application filing fee, the District will notify you at the conclusion of our review.

Thank you for your cooperation. Should you have any questions, please contact Mr. Kai Chan at (209) 557-6451.

Sincerely,

Arnaud Marjollet
Director of Permit Services

Rupi Gill
Permit Services Manager

AM: kc
CC: Brian Crets
J R Simplot Company
P.O. Box 198
Lathrop, CA 95330-0198

Seyed Sadredin
Executive Director/Air Pollution Control Officer

Northern Region
4800 Enterprise Way
Modesto, CA 95356-8718
Tel: (209) 557-6400 FAX: (209) 557-6475

Central Region (Main Office)
1990 E. Gettysburg Avenue
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Tel: (559) 230-6000 FAX: (559) 230-6061

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Tel: 661-392-5500 FAX: 661-392-5585

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San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT

HEALTHY AIR LIVING

August 15, 2013

John Yanak
J R Simplot Company
P.O. Box 198
Lathrop, CA 95330-0198

Re: 2nd Notice of Incomplete Application
Facility Number: N-767
Project Number: N-1131840

Dear Mr. Yanak:

The San Joaquin Valley Air Pollution Control District (District) has received your application for Emission Reduction Credits (ERCs) for SOx emissions resulting from the replacement of the catalysts in the converters serving the sulfuric acid plant under ATC permit N-767-9-15, at 16777 S. Howland Road in Lathrop, CA. This application precedes the actual emission reductions from the implementation of ATC permit N-767-9-15, which prevents us from processing this application at this time. We will consider this application incomplete until ATC permit N-767-9-15 is implemented and all information necessary to quantify and validate the actual emission reductions have been provided.

Thank you for your cooperation in this matter. If you have any questions, please contact Mr. Kai Chan at (209) 557-6451.

Sincerely,

David Warner
Director of Permit Services

Rupi Gill
Permit Services Manager
DW:kc

CC: Brian Crets
J.R. Simplot Company
P.O. Box 198
Lathrop, CA 95330

Seyed Sadredin
Executive Director/Air Pollution Control Officer

Northern Region
4800 Enterprise Way
Modesto, CA 95356-8718
Tel: (209) 557-6400 FAX: (209) 557-6475

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San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT

HEALTHY AIR LIVING

COPY

June 21, 2013

John Yanak
J.R.Simplot Company
P.O. Box 198
Lathrop, CA 95330-0198

Re: Notice of Incomplete Application
Facility Number: N-767
Project Number: N-1131840

Dear Mr. Yanak:

The District has received your Emission Reduction Credits (ERCs) banking application for ERCs resulting from the replacement of catalysts in the converters serving the sulfuric acid plant under ATC permit N-767-9-15, at 16777 S. Howland Road in Lathrop, CA. Based on our preliminary review, the District has determined that the application filing fee has not been fully paid, and your application is therefore incomplete. Payment of the attached invoice is required prior to further processing.

Please return your payment along with a copy of the attached invoice before the due date. The District cannot process your application until the attached invoice is paid in full.

Thank you for your cooperation in this matter. If you have any questions, please contact Mr. Kai Chan at (209) 557-6451.

Sincerely,

David Warner
Director of Permit Services

Rupi Gill
Permit Services Manager
DW:kc
Attachment

CC: Brian Cretes
J.R. Simplot Company
P.O. Box 198
Lathrop, CA 95330

Seyed Sadredin
Executive Director/Air Pollution Control Officer

Northern Region
4800 Enterprise Way
Modesto, CA 95356-8718
Tel: (209) 557-6400 FAX: (209) 557-6475

Central Region (Main Office)
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www.valleyair.org www.healthyairliving.com

San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT

Due Date	Amount Due
7/22/2013	$ 759.00

Amount Enclosed

ERCFEE N1131840
767 N99305 6/21/2013

RETURN THIS TOP PORTION ONLY, WITH REMITTANCE TO:

J R SIMPLOT COMPANY
RT 1100-0023
PO BOX 9168
BOISE, ID 83707

SJVAPCD
4800 Enterprise Way
Modesto, CA 95356-8718

Thank You!

San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT

SJVAPCD Tax ID: 77-0262563

Facility ID	Invoice Date	Invoice Number
N767	6/21/2013	N99305

Invoice Type
Project: N1131840

J R SIMPLOT COMPANY
16777 S. HOWLAND ROAD
LATHROP, CA 95330

PROJECT NUMBER: 1131840

APPLICATION FILING FEES	$ 759.00
LESS PREVIOUSLY PAID PROJECT FEES APPLIED TO THIS INVOICE	$ 0.00
PROJECT FEES DUE (Enclosed is a detailed statement outlining the fees for each item.)	**$ 759.00**

San Joaquin Valley Air Pollution Control District

Invoice Detail

Facility ID: N767

J R SIMPLOT COMPANY
16777 S. HOWLAND ROAD
LATHROP, CA 95330

Invoice Nbr: N99305
Invoice Date: 6/21/2013
Page: 1

Application Filing Fees

Project Nbr	Permit Number	Description	Application Fee
N1131840	N-767-1131840-0	Emission Reduction Credit Banking Evaluation Fee	$ 759.00
		Total Application Filing Fees:	**$ 759.00**

San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT

HEALTHY AIR LIVING

Northern Regional Office • 4800 Enterprise Way • Modesto, CA 95356-8718

Emission Reduction Credit Certificate
N-1250-5

ISSUED TO: J R SIMPLOT COMPANY

ISSUED DATE: February 21, 2017

LOCATION OF REDUCTION: 16777 S. HOWLAND ROAD
LATHROP, CA 95330

For SOx Reductions In The Amount Of:

Quarter 1	Quarter 2	Quarter 3	Quarter 4
10,191 lbs	18,116 lbs	16,984 lbs	11,323 lbs

Method Of Reduction

[ ] Shutdown of Entire Stationary Source
[ ] Shutdown of Emissions Units
[X] Other

Replacement of catalyst in the sulfuric acid plant converters that improved SO2 to SO3 conversion and reduced SO2 emissions (ATC N-767-9-15). THE ERCs MAY ONLY BE USED FOR EMISSION OFFSET PURPOSES AT 16777 S. HOWLAND ROAD IN LATHROP, CA (FACILITY N-767).

Use of these credits outside the San Joaquin Valley Unified Air Pollution Control District (SJVUAPCD) is not allowed without express written authorization by the SJVUAPCD.

Seyed Sadredin, Executive Director / APCO

Arnaud Marjollet, Director of Permit Services

Feb 22 2017 4:20PM -- THADBE

San Joaquin Valley Air Pollution Control District
Revised ERC Banking Application Review

Facility Name:	J R Simplot Company	Revision Date:	December 1, 2016
Mailing Address:	P.O. Box 198	Engineer:	Kai Chan
	Lathrop, CA 95330-0198	Lead Engineer:	Nick Peirce
Contact Person:	Michael Fallon		
Telephone:	(209) 858-6470		
Email:	Mike.Fallon@simplot.com		
Facility ID:	N-767		
Project #:	N-1131840		
Date Received:	May 28, 2013		
Deemed Complete:	June 5, 2014		

I. PROPOSAL:

J R Simplot Company is applying to bank Emission Reduction Credits (ERCs) resulting from the replacement of the catalysts in the two converters (R-301 and R-201) serving the sulfuric acid production plant and where appropriate high efficiency catalysts were utilized to improve the overall SO_2-to-SO_3 conversion efficiency. The use of the new catalysts resulted in a decrease in SO_2 emissions due to the improved SO_2-to-SO_3 conversion. Authority to Construct (ATC) permit N-767-9-15 authorizing the replacement of the catalysts (under Project #N-1131773) was issued on September 3, 2013. The sulfuric acid production plant is currently operating with the new high efficiency catalysts and lower SO_2 emissions limit under District Permit to Operate (PTO) N-767-9-21, which is attached in Appendix C for reference.

The following table provides the summary of the initial bankable emission reductions on a quarterly basis.

Initial Bankable Emission Reductions (lb-SO_2/quarter)				
Pollutant	**1st Quarter**	**2nd Quarter**	**3rd Quarter**	**4th Quarter**
SOx (as SO_2)	20,450	37,084	33,600	22,137

During the preliminary notice period of this ERC banking project on December 19, 2014, the USEPA submitted comments stating that these ERCs may not be "surplus" due to a Notice of Violation (NOV) issued to the facility for alleged violations of the Prevention of Significant Deterioration (PSD) requirements of the Federal Clean Air Act. At which time the J.R. Simplot Company agreed to delay the issuance of the ERCs until the NOV was resolved. In December 2015, the J.R. Simplot Company entered into a Consent Decree (Case No. 1:15-cv-00562-CWD) with the USEPA and the District to settle alleged Clean Air Act (CAA) violations at this facility. To satisfy the emission credit generation requirements, as outlined in Paragraphs 31, 32, and 33 of the Consent Decree (CD), the total bankable emission

reductions were reduced to 56,614 lb-SO_2/year. The following table provides the summary of the final bankable emission reductions on a quarterly basis.

Final Bankable Emission Reductions					
Pollutant	**Total (lb/year)**	**1st Quarter (lb/quarter)**	**2nd Quarter (lb/quarter)**	**3rd Quarter (lb/quarter)**	**4th Quarter (lb/quarter)**
SOx (as SO_2)	56,614	10,191	18,116	16,984	11,323

Per the CD, the following requirements will apply to the use of these ERCs:

- *These ERCs may only be used for emission offset purposes at the J R Simplot Company facility located at 16777 Howland Road in Lathrop, CA (Facility N-767).*

II. APPLICABLE RULES:

District Rule 2201: New and Modified Stationary Source Review (04/21/11)
District Rule 2301: Emission Reduction Credit Banking (01/19/12)

III. LOCATION OF REDUCTIONS:

The facility is located at 16777 Howland Road in Lathrop, California.

IV. METHOD OF GENERATING REDUCTIONS:

JR Simplot Company operates a sulfuric acid plant that manufactures sulfuric acid via a double-contact and double absorption process. To produce sulfuric acid, molten elemental sulfur is burned in a furnace to produce an SO_2 rich gas stream. After being passed through a heat recovery boiler to remove heat from the gas stream, the SO_2 is passed through a two-pass four-bed catalytic converter (R-301) where it reacts with oxygen to form SO_3. After the first converter, the now SO_3 rich gas stream is cooled and sent to an intermediate absorbing tower where much of the SO_3 is absorbed into a concentrated sulfuric acid solution. The exhaust gas from the intermediate absorbing tower is reheated and routed to a second multi-pass four-bed catalytic converter (R-201) where most of the remaining SO_2 is converted to SO_3. The gas stream exists the second converter, is cooled by heat recovery boilers, and is then routed to the final absorbing tower where virtually all of the remaining gas-phase SO_3 is absorbed into a concentrated sulfuric acid solution. The produced sulfuric acid is pumped into storage tanks.

The operation will emit SO_2 from the manufacturing process and is controlled with the existing mist eliminators on the absorption towers. The applicant did not make any changes to the existing control equipment. However, the applicant is proposing to use high efficiency catalysts in the existing converters, which will reduce SO_2 emissions by converting a higher quantity of SO_2 into SO_3 during the sulfuric acid manufacturing process.

V. EMISSIONS CALCULATIONS:

A. Assumptions:

1. SOx (as SO_2), sulfuric acid mist, PM_{10} (sulfuric acid mist emissions with an aerodynamic diameter less than 10 microns), and NOx will be emitted by the sulfuric acid manufacturing process. However, SO_2 emission reductions will only be generated due to the use of the high efficiency catalysts in the existing converters due to the improved SO_2-to-SO_3 conversion process.

2. Other assumptions will be stated as they are made.

B. Emission Factors (EF):

1. Pre-Modification SO_2 Emission Factors (EF1):

   The sulfuric acid production plant exhaust stack is equipped with continuous emissions monitors (CEMS) to measure SO_2 emissions. CEMS data is considered to be the best data available to estimate the emissions per District Policy APR-1110 (4/29/04). This data will be used to estimate the actual emissions for the purpose of this project.

2. Post-Modification SO_2 Emission Factors (EF2):

   The post-modification SO_2 emission factor is based on the applicant's proposed SOx emission limits and emission rates as indicated in the table below. These emission limits were verified by a source test conducted on Dec. 5, 2013.

Post-Modification Emission Factors for Permit N-767-9-16	
Pollutant	**EF2 and PE2**
$SOx_{Acid\ Plant}$ (EF2)	2.5 lb-SO_2/ton of 100% sulfuric acid produced[1]
$SOx_{Acid\ Plant}$ (Daily PE2)	1,750 lb-SO_2/day
$SOx_{Acid\ Plant}$ (Annual PE2)	410,296 lb-SO_2/year

C. Baseline Period:

Section 3.8 of District Rule 2201 defines the baseline period as a period of time equal to either the two consecutive years of operation immediately prior to the submission date of the complete application; or at least two consecutive years within the five years immediately prior to the submission of the complete application if it is more representative of normal source operations.

[1] Based on a proposed SOx emission rate of 1,750.0 lb/day and producing 700 tons/day of sulfuric acid, EF2 is equal to 2.5 lb-SO2/ton.

The Authority to Construct (ATC) permit application authorizing the use of the high efficiency catalysts, as processed under District Project #N-1131773, was received on May 28, 2013. ERC's are issued on a quarterly basis and the District will consider only full calendar quarters in the Baseline Period analysis. For this project the previous full calendar quarter is the first quarter of 2013. Therefore, the two consecutive years immediately prior to the submission date of the complete application is from April 1, 2011 to March 31, 2013 and will be the baseline period for this project.

D. Historical Actual Emissions:

Historical Actual Emissions (HAEs) are emissions that actually occurred, and are calculated from actual production records and established emission factors per Rule 2201, Section 6.2.1.

During CEMS data review, it is ensured that none of the readings is in excess of the permitted limits, and if there is any, it is corrected to the permitted limit. SO_2 emissions are summarized in the following table. The raw and corrected CEMS data is provided in Appendix B of this document.

HAE					
Year	**Q1 (lb-SO_2/qtr)**	**Q2 (lb-SO_2/qtr)**	**Q3 (lb-SO_2/qtr)**	**Q4 (lb-SO_2/qtr)**	**Total Annual (lb-SO_2/year)**
2011	---	186,593	156,788	95,956	---
2012	105,135	164,475	161,290	113,609	---
2013	88,459	---	---	---	---
Average	**96,797**	**175,534**	**159,039**	**104,783**	**536,153**

E. Actual Emissions Reductions (AERs):

Per Rule 2201, Section 4.12:

AER = HAE – Post Project Potential to Emit (PE2)

J R Simplot Company is not a seasonal source as defined in District Rule 2201, Section 3.37. The quarterly PE2 will be calculated based on the percentage of the annual actual emissions ($HAE_{Total\ Annual}$) occurring in each quarter during the baseline period calculated as follows:

Quarterly Operating Percentage = ($HAE_{Quarterly\ Emissions}$ ÷ $HAE_{Total\ Annual\ Emissions}$) × 100%
= ($HAE_{Quarterly\ Emissions}$ ÷ 536,153 lb-SO_2/year) × 100%

Quarterly PE2 (lb-SO_2/quarter) = Annual PE2 (lb-SO_2/year)
× Quarterly Operating Percentage
= 410,296 lb-SO_2/year
× Quarterly Operating Percentage

Quarter	HAE (lb-SO_2/quarter)	Quarterly Operating Percentage (%)	PE2 (lb-SO_2/quarter)
1	96,797	18.0540	74,075
2	175,534	32.7395	134,329
3	159,039	29.6630	121,706
4	104,783	19.5435	80,186

AER (lb-SO_2/quarter) = HAE (lb-SO_2/quarter) – PE2 (lb-SO_2/quarter)

AER			
Quarter	HAE (lb-SO_2/quarter)	PE2 (lb-SO_2/quarter)	AER (lb-SO_2/quarter)
1	96,797	74,075	22,722
2	175,534	134,329	41,205
3	159,039	121,706	37,333
4	104,783	80,186	24,597

F. Air Quality Improvement Reduction:

The air quality improvement deduction, per Rule 2201, Section 4.12.1, is 10% of the AERs. Therefore, the Air Quality Improvement Deduction will be calculated utilizing the following formula:

Air Quality Improvement Deduction = AER × 0.10

Air Quality Improvement Deduction		
Quarter	AER (lb-SO_2/quarter)	10% Deduction (lb-SO_2/quarter)
1	22,722	2,272
2	41,205	4,121
3	37,333	3,733
4	24,597	2,460

G. Increases in Permitted Emissions:

There is no increase in permitted emissions due to this project.

H. Bankable Emission Reductions:

The bankable ERCs presented below are determined by subtraction of the Air Quality Improvement Deductions from the AERs. Therefore:

Bankable Emission Reductions = AER – Air Quality Improvement Deductions

Bankable Emission Reductions			
Quarter	AER (lb-SO_2/quarter)	Air Quality Improvement Deductions (lb-SO_2/quarter)	Bankable Emission Reductions (lb-SO_2/quarter)
1	22,722	2,272	20,450
2	41,205	4,121	37,084
3	37,333	3,733	33,600
4	24,597	2,460	22,137

VI. COMPLIANCE:

To comply with the definition of Actual Emission Reductions (Rule 2201, Section 3.2.1 and Rule 2301, Sections 3.6 and 4.2.1), the reductions must be:

A. Real:

The emission reductions were generated by the replacement of the catalysts in the converters serving the sulfuric acid production plant with high efficiency catalysts, which resulted in a decrease in SO_2 emissions due to the improved SO_2-to-SO_3 conversion. If the replacement of the catalysts had not been done the emission reductions could not have otherwise occurred as authorized under ATC permit N-767-9-15. On December 5, 2013 a source test was conducted at the facility on the exhaust stack of the sulfuric acid plant. The results of the source test indicated a maximum SOx emission rate of 0.9 lb-SO_2/ton of sulfuric acid produced and 351 lb-SO_2/day, which verified compliance with the current SOx emission limits of 2.5 lb-SO_2/ton of sulfuric acid produced and 1,750 lb-SO_2/day, respectively. In addition, recent review of their quarterly CEMs data from the sulfuric acid plant also verified compliance with these SOx emission limits. The District is satisfied that emissions in the amounts calculated did indeed occur. Therefore, the emission reductions are real.

B. Enforceable:

The reductions are enforceable since ATC permit N-767-9-15 to implement the replacement of the catalysts has been converted into PTO N-767-9-16. The resulting lower SOx emissions limit of 2.5 lb-SO_2/ton of sulfuric acid produced at a sulfuric acid production rate limit of 700 tons/day are required by the conditions on the PTO and compliance with this limit was verified by a source test conducted at the sulfuric acid plant on December 5, 2013. Continued compliance with these limits will be verified by the required annual source testing and CEM system. In addition, the SOx emission limits are performance based limitations in pounds per ton of sulfuric acid produced, pounds of emissions per day, and pounds of emissions per year. The Permit to Operate and subsequent Permits to Operate for this sulfuric acid plant will maintain the performance based limitations for SOx. The conditions will include language stating that this condition is to enforce emission reductions of this project. This addition will ensure enforceability of the emission reduction credits for all future actions pertaining to this Permit to Operate (PTO N-767-9-16 is attached in Appendix C). Therefore, the reductions are enforceable.

C. Quantifiable:

The reductions were calculated utilizing the facilities historic CEMs data and methodologies consistent with District Rule 2201. Therefore the reductions are quantifiable.

D. Permanent:

The equipment description of the PTO lists the required emission control equipment, SOx emission limits are present on the permit, annual source testing and a CEM system is required to verify compliance with the SOx emission limits. Therefore, the reductions are permanent.

E. Surplus:

The applicant is proposing ERC's for SOx emissions from a sulfuric acid production plant. To determine whether or not reductions are surplus, the District must examine its current and proposed rules as well as requirements projected to apply to operations for which ERC's are proposed. The District also considers other District's rules during a surplus emission analysis. After examining all current, pending and projected regulations, the District will discount the emission factors to the level of the most stringent rule. And finally, discounting for any baseline period emission limit violations will also be performed. During this analysis, rules from the following agencies will be considered:

United States Environmental Protection Agency (USEPA)
California Air Resources Board (CARB)
San Joaquin Valley Air Pollution Control District (SJVAPCD)
South Coast Air Quality Management District (SCAQMD)
Bay Area Air Quality Management District (BAAQMD)
Sacramento Metropolitan Air Quality Management District (SMAQMD)

Below are the rules that will be considered:

Agency	Sulfur Compound Rules
USEPA	40 CFR Part 60, Subpart H
CARB	No Applicable Rules
SJVAPCD	4801
SCAQMD	469
BAAQMD	Regulation 9, Rule 1
SMAQMD	406, Section 301

Sulfur Compound Rules:

40 CFR Part 60, Subpart H – Standards of Performance for Sulfuric Acid Plants

§60.82(a) of this rule limits sulfur dioxide (SO_2) emissions to not exceed 4 lb/ton (2 kg/metric ton) expressed as 100 percent H_2SO_4. The historical actual emissions used in this project were based on facility CEMS data that complies with the permitted limit

of 4 lb/ton. Therefore, the proposed bankable emission reductions are surplus of this USEPA Regulation.

SJVAPCD Rule 4801 – Sulfur Compounds

Section 3.1 of this rule states that a person shall not discharge into the atmosphere sulfur compounds, which would exist as a liquid or gas at standard conditions, exceeding in concentration at the point of discharge: 0.2 % by volume (or 2,000 ppmv) calculated as SO_2, on a dry basis averaged over 15 consecutive minutes.

The HAE was calculated based on actual emissions with a sulfuric acid production plant potential to emit limit of 2,461 lb-SOx/day, 102.5 lb-SOx/hour, or 1.71 lb-SOx/min (based on operating 24 hr/day or 1,440 min/day). Therefore, the volume of SO_2 can be calculated using the following formula based on the ideal gas equation with an exhaust flow rate of 21,602 dscf/min:

$$\frac{1.71\ \text{lb} - \text{SOx}}{\text{Min}} \times \frac{\text{Min}}{21{,}602\ \text{dscf}} \times \frac{\text{lb} \cdot \text{mol}}{64\ \text{lb}} \times \frac{379.5 \cdot \text{ft}^3}{\text{lb} \cdot \text{mol}} \times \frac{1{,}000{,}000 \cdot \text{parts}}{\text{million}} = 469.4\ \frac{\text{parts}}{\text{million}}$$

SO_2 Concentration = 469.4 ppmv < 2,000 ppmv (or 0.2%)

Therefore, the proposed bankable emission reduction credits are surplus of District Rule 4801 requirements.

SCAQMD Rule 469 – Sulfuric Acid Units

Section (a) of this rule states that a person shall not discharge into the atmosphere form any sulfuric acid unit, effluent process gas containing more than: (1) 500 ppm of sulfur compounds expressed as SO_2, calculated on a dry basis averaged over a minimum of 15 consecutive minutes.; (2) 90 kilograms (198.5 pounds) per hour of sulfur compounds expressed as SO_2.

As determined above, HAE was calculated based on a maximum SO_2 concentration of 469.5 ppmv and a maximum emission rate of 102.5 lb/hour, which is less than these rule requirements. Therefore, the proposed bankable emission reduction credits are surplus of SCAQMD Rule 469 requirements.

BAAQMD Regulation 9 - Inorganic Gaseous Pollutions, Rule 1 - Sulfur Dioxide

Section 9-1-309 of this rule states that a person shall not emit, from any source in a sulfuric acid plant, effluent process gas containing sulfur dioxide in excess of 300 ppm by volume calculated at 12% oxygen. To determine if the HAE exceeds this regulation, this requirement will be converted to a lb/hr value using the maximum exhaust flow rate for the sulfuric acid plant of 21,602 dscf/min and the following equation:

$$\frac{300\ \text{ppmv}}{10^6} \times \frac{64\ \text{lb}}{\text{lb mol}} \times \frac{\text{lb} \cdot \text{mol}}{379.5\ \text{ft}^3} \times \frac{21{,}602\ \text{dscf}}{\text{min}} \times \frac{60\ \text{min}}{\text{hour}} \times \frac{20.95}{(20.95 - 12.0)} = 153.5\ \frac{\text{lb} - \text{SO}_2}{\text{hour}}$$

As determined above, the HAE was calculated based on a maximum SO_2 emission rate of 102.5 lb/hour, which is less than this rule requirement. Therefore, the proposed bankable emission reduction credits are surplus of BAAQMD Regulation 9, Rule 1 requirements.

SMAQMD Rule 406 - Specific Contaminants, Section 300 – Standards

Section 301 of this rules states that a person shall not discharge into the atmosphere from any single source of emission whatsoever sulfur compounds in any state or combination thereof exceeding in concentration at the point of discharge: sulfur compounds, calculated as sulfur dioxide (SO_2): 0.2% by volume (2,000 ppmv) except as otherwise provided in Rule 420.

As determined above, the HAE was calculated based on a maximum SO_2 concentration of 469.5 ppmv, which is less than this rule requirement. Therefore, the proposed bankable emission reduction credits are surplus of SMAQMD Rule 406, Section 300 requirements.

F. Not used for the approval of an Authority to Construct or as Offsets:

The ERCs generated by the replacement of the catalysts in the two converters (R-301 and R-201) serving the sulfuric acid production plant were not used for the approval of any Authority to Construct or as offsets.

G. Timely Submittal:

Section 5.5 of Rule 2301 states that ERC certificate applications for reductions shall be submitted within 180 days after modification and startup (date of permanent emission reductions) of the emissions unit. The modification and equipment startup occurred on October 14, 2013, and the ERC application was received on May 28, 2013. Therefore, the application was submitted in a timely fashion since the application was received prior to 180 days of the modified equipment startup date.

VII. RECOMMENDATION:

The District recommends that an ERC Certificate be issued to J R Simplot Company for the amount indicated in the following table as limited by USEPA Consent Decree (Case No. 1:15-cv-00562-CWD).

Final Bankable Emission Reductions in lb/quarter				
Pollutant	**1st Quarter**	**2nd Quarter**	**3rd Quarter**	**4th Quarter**
SOx (as SO_2)	10,191	18,116	16,984	11,323

Per the Consent Decree, the following requirements will apply to the use of these ERCs:

- *These ERCs may only be used for emission offset purposes at the J R Simplot Company facility located at 16777 Howland Road in Lathrop, CA (Facility N-767).*

APPENDICES:

Appendix A Draft ERC Certificate
Appendix B Copy of the Raw and Corrected CEM Data for HAE Calculations
Appendix C Permit to Operate N-767-9-21

Appendix A

Draft ERC Certificate

San Joaquin Valley
Air Pollution Control District

Northern Regional Office • 4800 Enterprise Way • Modesto, CA 95356-8718

Emission Reduction Credit Certificate

N-1250-5

DRAFT

ISSUED TO: J R SIMPLOT COMPANY

ISSUED DATE: <DRAFT>

LOCATION OF REDUCTION: 16777 S. HOWLAND ROAD
LATHROP, CA 95330

For SOx Reductions In The Amount Of:

Quarter 1	Quarter 2	Quarter 3	Quarter 4
10,191 lbs	18,116 lbs	16,984 lbs	11,323 lbs

Method Of Reduction

[ ] Shutdown of Entire Stationary Source
[ ] Shutdown of Emissions Units
[X] Other

Replacement of catalyst in the sulfuric acid plant converters that improved SO2 to SO3 conversion and reduced SO2 emissions (ATC N-767-9-15). THE ERCs MAY ONLY BE USED FOR EMISSION OFFSET PURPOSES AT 16777 S. HOWLAND ROAD IN LATHROP, CA (FACILITY N-767).

Use of these credits outside the San Joaquin Valley Unified Air Pollution Control District (SJVUAPCD) is not allowed without express written authorization by the SJVUAPCD.

Seyed Sadredin, Executive Director / APCO

DRAFT

Arnaud Marjollet, Director of Permit Services

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Appendix B

Copy of the Raw and Corrected CEM Data for HAE Calculations

Monthly Summaries

Date	Adjusted SO2 Emissions (lbs)	100% H2SO4 Production (tons)	24-M Avg SO2 (T/yr)	H2SO4 EF (lb/T)	H2SO4 Emissions (T)	24-M Avg H2SO4 (T/yr)	24-M Avg Production (T/yr)
Apr-2011	49,671	16,448	262	0.093	0.76	8.35	175,733
May-2011	69,004	56,392 / 20,342	264	0.093	0.95	8.35	176,717
Jun-2011	67,918	19,602	271	0.093	0.91	8.44	179,574
Jul-2011	64,293	20,190	280	0.093	0.94	8.51	181,894
Aug-2011	50,454	48,742 / 15,595	277	0.093	0.73	8.39	180,479
Sep-2011	42,041	12,957	277	0.093	0.60	8.39	181,208
Oct-2011	7,616	4,371	273	0.093	0.20	8.30	179,534
Nov-2011	48,418	35,618 / 17,340	274	0.093	0.81	8.31	180,790
Dec-2011	39,922	13,907	274	0.093	0.65	8.30	181,305
Jan-2012	33,895	11,340	275	0.154	0.87	8.49	181,382
Feb-2012	30,292	35,287 / 10,331	272	0.154	0.80	8.59	179,977
Mar-2012	40,948	13,616	269	0.154	1.05	8.75	178,696
Apr-2012	50,762	16,830	271	0.154	1.30	9.10	180,509
May-2012	60,233	53,666 / 19,323	272	0.154	1.49	9.46	181,647
Jun-2012	53,480	16,513	273	0.154	1.27	9.71	181,293
Jul-2012	69,946	20,429	279	0.154	1.57	10.13	183,324
Aug-2012	51,850	47,679 / 15,473	283	0.154	1.19	10.41	184,207
Sep-2012	39,494	11,777	278	0.154	0.91	10.46	180,990
Oct-2012	22,579	7,890	280	0.154	0.61	10.66	182,681
Nov-2012	56,587	36,536 / 16,212	287	0.154	1.25	11.02	184,922
Dec-2012	34,443	12,434	281	0.154	0.96	11.06	181,445
Jan-2013	28,353	10,428	277	0.154	0.80	11.07	178,266
Feb-2013	29,606	36,943 / 12,574	274	0.154	0.97	11.19	176,709
Mar-2013	30,500	13,941	268	0.154	1.07	11.32	174,932

186,593 | 156,788 | 95,956 | 105,135 | 164,475 | 161,290 | 113,609 | 88,459

Adjusted Daily Values

Date	Raw 15-min SO2 Avg	Adj. 15-min SO2 Avg	Raw 3-hr SO2 Avg	Adj. 3-hr SO2 Avg	Raw ppmv SO2 Avg	Adj. ppmv SO2 Avg	Raw Daily Rate (SO2 lb/day)	Adj. Daily Rate (SO2 lb/day)	Final Daily Rate (SO2 lb/day)
04/01/2011	3.04	3.04	3.04	3.04	272	272	1,377	1,377	1,377
04/02/2011	3.03	3.03	3.03	3.03	274	274	1,404	1,404	1,404
04/03/2011	3.10	3.10	3.09	3.09	284	284	1,443	1,443	1,443
04/04/2011	3.19	3.19	3.18	3.18	294	294	1,466	1,466	1,466
04/05/2011	2.98	3.01	2.98	2.98	274	274	1,511	1,511	1,511
04/06/2011	3.05	3.05	3.06	3.06	279	279	1,469	1,469	1,469
04/07/2011	2.95	2.95	2.95	2.95	266	266	1,457	1,457	1,457
04/08/2011	3.00	3.00	2.99	2.99	273	273	1,467	1,467	1,467
04/09/2011	2.96	2.96	2.97	2.97	266	266	1,557	1,557	1,557
04/10/2011	2.94	2.94	2.93	2.93	264	264	1,610	1,610	1,610
04/11/2011	3.11	3.11	3.09	3.09	284	284	1,663	1,663	1,663
04/12/2011	3.10	3.10	3.10	3.10	282	282	1,842	1,842	1,842
04/13/2011	3.04	3.04	3.04	3.04	274	274	1,861	1,861	1,861
04/14/2011	3.03	3.03	3.02	3.02	273	273	1,824	1,824	1,824
04/15/2011	3.11	3.11	3.11	3.11	283	283	1,817	1,817	1,817
04/16/2011	3.26	3.26	3.01	3.01	280	280	1,868	1,868	1,868
04/17/2011	3.25	3.25	3.25	3.25	296	296	1,265	1,265	1,265
04/18/2011	3.12	3.12	3.14	3.14	279	279	1,985	1,985	1,985
04/19/2011	3.41	3.41	3.41	3.41	313	313	1,419	1,419	1,419
04/20/2011	3.23	3.23	3.23	3.23	293	293	2,061	2,061	2,061
04/21/2011	3.13	3.13	3.11	3.11	279	279	1,956	1,956	1,956
04/22/2011	3.28	3.28	3.28	3.28	297	297	1,905	1,905	1,905
04/23/2011	3.29	3.29	3.29	3.29	298	298	2,024	2,024	2,024
04/24/2011	3.27	3.27	3.26	3.26	295	295	2,027	2,027	2,027
04/25/2011	3.29	3.29	3.28	3.28	298	298	1,988	1,988	1,988
04/26/2011	3.35	3.35	3.35	3.35	307	307	1,994	1,994	1,994
04/27/2011	3.30	3.30	3.30	3.30	301	301	2,031	2,031	2,031
04/28/2011	12.91	6.35	14.24	3.63	236	236	1,842	1,842	470
04/29/2011	3.38	3.38	3.37	3.37	310	310	862	862	862
04/30/2011	3.40	3.40	3.41	3.41	312	312	2,047	2,047	2,047
05/01/2011	3.27	3.27	3.26	3.26	299	299	2,081	2,081	2,081
05/02/2011	3.34	3.34	3.33	3.33	307	307	2,022	2,022	2,022
05/03/2011	3.32	3.33	3.32	3.31	292	293	2,129	2,129	2,124
05/04/2011	3.30	3.30	3.30	3.30	303	303	2,039	2,039	2,039
05/05/2011	3.25	3.25	3.27	3.27	296	296	2,121	2,121	2,121
05/06/2011	3.24	3.24	3.23	3.23	292	292	2,090	2,090	2,090
05/07/2011	3.37	3.37	3.37	3.37	307	307	2,093	2,093	2,093
05/08/2011	3.35	3.35	3.34	3.34	305	305	2,172	2,172	2,172
05/09/2011	3.36	3.36	3.35	3.35	305	305	2,155	2,155	2,155
05/10/2011	3.33	3.33	3.33	3.33	302	302	2,159	2,159	2,159
05/11/2011	3.38	3.38	3.38	3.38	308	308	2,139	2,139	2,139
05/12/2011	3.37	3.37	3.36	3.36	306	306	2,167	2,167	2,167
05/13/2011	3.39	3.39	3.38	3.38	309	309	2,224	2,224	2,224
05/14/2011	3.40	3.40	3.40	3.40	309	309	2,278	2,278	2,278
05/15/2011	3.43	3.43	3.43	3.43	310	310	2,288	2,288	2,288
05/16/2011	3.45	3.45	3.44	3.44	313	313	2,295	2,295	2,295
05/17/2011	3.51	3.51	3.51	3.51	320	320	2,312	2,312	2,312
05/18/2011	3.50	3.50	3.51	3.51	321	321	2,361	2,361	2,361
05/19/2011	3.43	3.43	3.43	3.43	313	313	2,348	2,348	2,348
05/20/2011	3.40	3.40	3.40	3.40	310	310	2,295	2,295	2,295
05/21/2011	3.40	3.40	3.40	3.40	309	309	2,272	2,272	2,272
05/22/2011	3.41	3.41	3.40	3.40	309	309	2,275	2,275	2,275
05/23/2011	3.45	3.45	3.44	3.44	313	313	2,277	2,277	2,277
05/24/2011	3.37	3.37	3.37	3.37	303	303	2,302	2,302	2,302
05/25/2011	3.41	3.41	3.40	3.40	308	308	2,266	2,266	2,266
05/26/2011	3.39	3.39	3.39	3.39	307	307	2,296	2,296	2,296
05/27/2011	3.43	3.43	3.43	3.43	313	313	2,278	2,278	2,278
05/28/2011	3.43	3.43	3.42	3.42	312	312	2,309	2,309	2,309
05/29/2011	3.46	3.46	3.46	3.46	315	315	2,311	2,311	2,311
05/30/2011	3.44	3.44	3.43	3.43	312	312	2,339	2,339	2,339
05/31/2011	3.41	3.41	3.41	3.41	308	308	2,314	2,314	2,314
06/01/2011	3.33	3.33	3.33	3.33	298	298	2,296	2,296	2,296

Adjusted Daily Values

Date	Raw 15-min SO2 Avg	Adj. 15-min SO2 Avg	Raw 3-hr SO2 Avg	Adj. 3-hr SO2 Avg	Raw ppmv SO2 Avg	Adj. ppmv SO2 Avg	Raw Daily Rate (SO2 lb/day)	Adj. Daily Rate (SO2 lb/day)	Final Daily Rate (SO2 lb/day)
06/02/2011	4.56	4.56	3.89	3.50	355	355	2,237	2,237	2,013
06/03/2011	3.36	3.36	3.35	3.35	302	302	1,366	1,366	1,366
06/04/2011	3.46	3.46	3.45	3.45	316	316	2,249	2,249	2,249
06/05/2011	3.35	3.35	3.35	3.35	303	303	2,342	2,342	2,342
06/06/2011	3.43	3.43	3.43	3.43	313	313	2,259	2,259	2,259
06/07/2011	3.22	3.27	3.30	3.30	301	301	2,311	2,311	2,311
06/08/2011	3.39	3.39	3.39	3.39	310	310	2,229	2,229	2,229
06/09/2011	3.42	3.42	3.43	3.43	312	312	2,289	2,289	2,289
06/10/2011	3.26	3.26	3.24	3.24	296	296	2,278	2,278	2,278
06/11/2011	3.47	3.47	3.46	3.46	317	317	2,124	2,124	2,124
06/12/2011	3.51	3.51	3.51	3.51	321	321	2,351	2,351	2,351
06/13/2011	3.45	3.45	3.45	3.45	314	314	2,372	2,372	2,372
06/14/2011	3.45	3.45	3.45	3.45	314	314	2,335	2,335	2,335
06/15/2011	3.37	3.37	3.37	3.37	306	306	2,338	2,338	2,338
06/16/2011	3.32	3.32	3.32	3.32	299	299	2,284	2,284	2,284
06/17/2011	3.36	3.36	3.35	3.35	303	303	2,267	2,267	2,267
06/18/2011	3.39	3.39	3.39	3.39	305	305	2,299	2,299	2,299
06/19/2011	3.37	3.37	3.37	3.37	304	304	2,307	2,307	2,307
06/20/2011	3.40	3.40	3.39	3.39	307	307	2,297	2,297	2,297
06/21/2011	3.43	3.43	3.44	3.44	311	311	2,307	2,307	2,307
06/22/2011	3.41	3.41	3.40	3.40	308	308	2,330	2,330	2,330
06/23/2011	3.42	3.42	3.42	3.42	308	308	2,316	2,316	2,316
06/24/2011	3.41	3.41	3.40	3.40	306	306	2,334	2,334	2,334
06/25/2011	3.43	3.43	3.42	3.42	308	308	2,324	2,324	2,324
06/26/2011	3.44	3.44	3.43	3.43	310	310	2,336	2,336	2,336
06/27/2011	3.44	3.44	3.44	3.44	310	310	2,338	2,338	2,338
06/28/2011	3.47	3.47	3.47	3.47	312	312	2,343	2,343	2,343
06/29/2011	3.41	3.41	3.40	3.40	305	305	2,360	2,360	2,360
06/30/2011	3.43	3.43	3.45	3.45	311	311	2,324	2,324	2,324
07/01/2011	3.35	3.35	3.35	3.35	305	305	2,341	2,341	2,341
07/02/2011	3.44	3.44	3.44	3.44	315	315	2,285	2,285	2,285
07/03/2011	3.38	3.38	3.38	3.38	307	307	2,345	2,345	2,345
07/04/2011	3.42	3.42	3.42	3.42	312	312	2,285	2,285	2,285
07/05/2011	3.37	3.37	3.36	3.36	308	308	2,325	2,325	2,325
07/06/2011	3.34	3.34	3.34	3.34	304	304	2,293	2,293	2,293
07/07/2011	3.40	3.40	3.40	3.40	310	310	2,269	2,269	2,269
07/08/2011	3.36	3.36	3.36	3.36	305	305	2,320	2,320	2,320
07/09/2011	3.35	3.35	3.35	3.35	303	303	2,276	2,276	2,276
07/10/2011	3.31	3.31	3.31	3.31	298	298	2,282	2,282	2,282
07/11/2011	3.40	3.40	3.39	3.39	302	302	2,253	2,253	2,253
07/12/2011	3.38	3.38	3.38	3.38	306	306	2,294	2,294	2,294
07/13/2011	3.42	3.42	3.42	3.42	309	309	2,317	2,317	2,317
07/14/2011	3.37	3.37	3.37	3.37	303	303	2,344	2,344	2,344
07/15/2011	3.38	3.38	3.38	3.38	306	306	2,304	2,304	2,304
07/16/2011	3.41	3.41	3.41	3.41	309	309	2,321	2,321	2,321
07/17/2011	3.38	3.38	3.38	3.38	307	307	2,333	2,333	2,333
07/18/2011	3.36	3.36	3.36	3.36	304	304	2,309	2,309	2,309
07/19/2011	3.32	3.32	3.32	3.32	301	301	2,289	2,289	2,289
07/20/2011	3.33	3.33	3.33	3.33	303	303	2,256	2,256	2,256
07/21/2011	3.32	3.32	3.32	3.32	305	305	2,262	2,262	2,262
07/22/2011	3.36	3.36	3.35	3.35	311	311	2,276	2,276	2,276
07/23/2011	74.35	5.77	72.23	3.38	541	456	0	0	0
07/24/2011	2.81	2.81	2.80	2.80	254	254	1,037	1,037	1,037
07/25/2011	2.77	2.77	2.77	2.77	251	251	1,847	1,847	1,847
07/26/2011	2.84	2.84	2.84	2.84	259	259	1,824	1,824	1,824
07/27/2011	2.79	2.79	2.79	2.79	254	254	1,902	1,902	1,902
07/28/2011	2.71	2.71	2.72	2.72	246	246	1,887	1,887	1,887
07/29/2011	2.58	2.58	2.58	2.58	233	233	1,835	1,835	1,835
07/30/2011	2.41	2.41	2.41	2.41	218	218	1,743	1,743	1,743
07/31/2011	2.21	2.21	2.23	2.23	202	202	1,634	1,634	1,634
08/01/2011	1.81	1.81	1.84	1.84	165	165	1,512	1,512	1,512
08/02/2011	2.59	2.62	2.48	2.48	241	241	1,233	1,233	1,233

Adjusted Daily Values

Date	Raw 15-min SO2 Avg	Adj. 15-min SO2 Avg	Raw 3-hr SO2 Avg	Adj. 3-hr SO2 Avg	Raw ppmv SO2 Avg	Adj. ppmv SO2 Avg	Raw Daily Rate (SO2 lb/day)	Adj. Daily Rate (SO2 lb/day)	Final Daily Rate (SO2 lb/day)
08/03/2011	3.45	3.45	3.45	3.45	309	309	1,819	1,819	1,819
08/04/2011	3.30	3.30	3.30	3.30	297	297	2,334	2,334	2,334
08/05/2011	3.45	3.45	3.46	3.46	311	311	2,253	2,253	2,253
08/06/2011	3.45	3.45	3.45	3.45	311	311	2,342	2,342	2,342
08/07/2011	3.42	3.42	3.42	3.42	307	307	2,349	2,349	2,349
08/08/2011	3.45	3.45	3.45	3.45	310	310	2,324	2,324	2,324
08/09/2011	3.58	3.58	3.39	3.34	314	314	2,334	2,334	2,297
08/10/2011	3.31	3.31	3.30	3.30	302	302	1,423	1,423	1,423
08/11/2011	3.29	3.29	3.29	3.29	299	299	2,160	2,160	2,160
08/12/2011	3.31	3.31	3.30	3.30	301	301	2,183	2,183	2,183
08/13/2011	3.21	3.21	3.22	3.22	291	291	2,191	2,191	2,191
08/14/2011	2.98	2.98	2.98	2.98	270	270	2,048	2,048	2,048
08/15/2011	2.95	2.95	2.95	2.95	267	267	1,409	1,409	1,409
08/16/2011	2.98	2.98	2.97	2.97	272	272	1,364	1,364	1,364
08/17/2011	3.08	3.08	3.09	3.09	284	284	1,383	1,383	1,383
08/18/2011	3.08	3.08	3.07	3.07	283	283	1,445	1,445	1,445
08/19/2011	3.02	3.02	3.01	3.01	276	276	1,373	1,373	1,373
08/20/2011	3.11	3.11	3.11	3.11	286	286	1,152	1,152	1,152
08/21/2011	3.07	3.07	3.08	3.08	280	280	1,179	1,179	1,179
08/22/2011	3.08	3.08	3.06	3.06	281	281	1,162	1,162	1,162
08/23/2011	3.14	3.14	3.15	3.15	288	288	1,157	1,157	1,157
08/24/2011	2.97	2.97	2.97	2.97	268	268	1,177	1,177	1,177
08/25/2011	3.04	3.04	3.03	3.03	280	280	1,171	1,171	1,171
08/26/2011	2.91	2.91	2.92	2.92	264	264	1,319	1,319	1,319
08/27/2011	2.91	2.91	2.90	2.90	263	263	1,280	1,280	1,280
08/28/2011	2.99	2.99	2.98	2.98	273	273	1,291	1,291	1,291
08/29/2011	2.97	2.97	2.98	2.98	271	271	1,341	1,341	1,341
08/30/2011	3.01	3.01	3.01	3.01	278	278	1,349	1,349	1,349
08/31/2011	2.98	2.98	2.98	2.98	272	272	1,437	1,437	1,437
09/01/2011	3.00	3.00	2.99	2.99	275	275	1,415	1,415	1,415
09/02/2011	3.00	3.00	3.00	3.00	277	277	1,420	1,420	1,420
09/03/2011	2.90	2.90	2.90	2.90	263	263	1,420	1,420	1,420
09/04/2011	2.88	2.88	2.88	2.88	261	261	1,317	1,317	1,317
09/05/2011	2.96	2.96	2.95	2.95	271	271	1,331	1,331	1,331
09/06/2011	2.88	2.88	2.96	2.95	256	256	1,380	1,380	1,375
09/07/2011	2.97	2.97	2.97	2.97	272	272	1,292	1,292	1,292
09/08/2011	3.01	3.01	3.00	3.00	274	274	1,496	1,496	1,496
09/09/2011	3.06	3.06	3.05	3.05	279	279	1,694	1,694	1,694
09/10/2011	3.10	3.10	3.10	3.10	281	281	1,755	1,755	1,755
09/11/2011	3.13	3.13	3.13	3.13	282	282	1,871	1,871	1,871
09/12/2011	3.16	3.16	3.15	3.15	285	285	1,915	1,915	1,915
09/13/2011	3.18	3.18	3.17	3.17	288	288	1,924	1,924	1,924
09/14/2011	3.10	3.10	3.10	3.10	281	281	1,936	1,936	1,936
09/15/2011	3.08	3.08	3.07	3.07	274	274	1,896	1,896	1,896
09/16/2011	3.24	3.24	3.23	3.23	291	291	1,950	1,950	1,950
09/17/2011	3.41	3.41	3.40	3.40	310	310	2,146	2,146	2,146
09/18/2011	3.40	3.40	3.40	3.40	309	309	2,317	2,317	2,317
09/19/2011	3.45	3.45	3.44	3.44	315	315	2,298	2,298	2,298
09/20/2011	3.41	3.41	3.40	3.40	311	311	2,336	2,336	2,336
09/21/2011	3.47	3.47	3.46	3.46	316	316	2,305	2,305	2,305
09/22/2011	3.41	3.41	3.41	3.41	310	310	2,341	2,341	2,341
09/23/2011	3.40	3.40	3.42	3.42	307	307	2,290	2,290	2,290
09/24/2011	0.00	0.00	0.00	0.00	0	0	0	0	0
09/25/2011	0.00	0.00	0.00	0.00	0	0	0	0	0
09/26/2011	0.00	0.00	0.00	0.00	0	0	0	0	0
09/27/2011	0.00	0.00	0.00	0.00	0	0	0	0	0
09/28/2011	0.00	0.00	0.00	0.00	0	0	0	0	0
09/29/2011	0.00	0.00	0.00	0.00	0	0	0	0	0
09/30/2011	0.00	0.00	0.00	0.00	0	0	0	0	0
10/01/2011	0.00	0.00	0.00	0.00	0	0	0	0	0
10/02/2011	0.00	0.00	0.00	0.00	0	0	0	0	0
10/03/2011	0.00	0.00	0.00	0.00	0	0	0	0	0

Adjusted Daily Values

Date	Raw 15-min SO2 Avg	Adj. 15-min SO2 Avg	Raw 3-hr SO2 Avg	Adj. 3-hr SO2 Avg	Raw ppmv SO2 Avg	Adj. ppmv SO2 Avg	Raw Daily Rate (SO2 lb/day)	Adj. Daily Rate (SO2 lb/day)	Final Daily Rate (SO2 lb/day)
10/04/2011	0.00	0.00	0.00	0.00	0	0	0	0	0
10/05/2011	0.00	0.00	0.00	0.00	0	0	0	0	0
10/06/2011	0.00	0.00	0.00	0.00	0	0	0	0	0
10/07/2011	0.00	0.00	0.00	0.00	0	0	0	0	0
10/08/2011	0.00	0.00	0.00	0.00	0	0	0	0	0
10/09/2011	0.00	0.00	0.00	0.00	0	0	0	0	0
10/10/2011	0.00	0.00	0.00	0.00	0	0	0	0	0
10/11/2011	0.00	0.00	0.00	0.00	0	0	0	0	0
10/12/2011	0.00	0.00	0.00	0.00	0	0	0	0	0
10/13/2011	0.00	0.00	0.00	0.00	0	0	0	0	0
10/14/2011	0.00	0.00	0.00	0.00	0	0	0	0	0
10/15/2011	0.00	0.00	0.00	0.00	0	0	0	0	0
10/16/2011	0.00	0.00	0.00	0.00	0	0	0	0	0
10/17/2011	0.00	0.00	0.00	0.00	0	0	0	0	0
10/18/2011	0.00	0.00	0.00	0.00	0	0	0	0	0
10/19/2011	0.00	0.00	0.00	0.00	0	0	0	0	0
10/20/2011	0.00	0.00	0.00	0.00	0	0	0	0	0
10/21/2011	0.00	0.00	0.00	0.00	0	0	0	0	0
10/22/2011	2.18	2.18	2.25	2.25	190	190	0	0	0
10/23/2011	5.78	3.28	5.82	2.27	171	171	563	563	220
10/24/2011	1.86	1.86	1.85	1.85	168	168	798	798	798
10/25/2011	1.87	1.87	1.88	1.88	168	168	868	868	868
10/26/2011	1.78	1.78	1.78	1.78	161	161	871	871	871
10/27/2011	1.62	1.62	1.64	1.64	146	146	869	869	869
10/28/2011	2.24	2.24	2.18	2.18	204	204	894	894	894
10/29/2011	5.33	3.08	5.32	2.65	235	235	1,454	1,454	724
10/30/2011	2.42	2.42	2.42	2.42	216	216	1,416	1,416	1,416
10/31/2011	4.52	3.28	2.42	2.42	214	214	1,318	1,318	955
11/01/2011	4.60	3.30	3.68	2.80	254	254	997	997	715
11/02/2011	2.44	2.44	2.45	2.45	219	219	1,464	1,464	1,464
11/03/2011	3.93	3.81	3.90	2.86	224	224	1,257	1,257	922
11/04/2011	2.74	2.74	2.74	2.74	254	254	1,273	1,273	1,273
11/05/2011	2.77	2.77	2.77	2.77	256	256	1,617	1,617	1,617
11/06/2011	2.78	2.78	2.78	2.78	258	258	1,642	1,642	1,642
11/07/2011	2.80	2.80	2.80	2.80	260	260	1,715	1,715	1,715
11/08/2011	2.75	2.75	2.76	2.76	254	254	1,684	1,684	1,684
11/09/2011	2.70	2.70	2.70	2.70	249	249	1,679	1,679	1,679
11/10/2011	2.70	2.70	2.70	2.70	248	248	1,582	1,582	1,582
11/11/2011	2.81	2.81	2.80	2.80	260	260	1,662	1,662	1,662
11/12/2011	2.92	2.92	2.92	2.92	273	273	1,806	1,806	1,806
11/13/2011	2.88	2.88	2.88	2.88	267	267	1,944	1,944	1,944
11/14/2011	2.78	2.78	2.78	2.78	256	256	1,940	1,940	1,940
11/15/2011	3.38	3.38	3.38	2.89	225	225	1,766	1,766	1,508
11/16/2011	2.67	2.67	2.66	2.66	245	245	1,408	1,408	1,408
11/17/2011	2.69	2.69	2.70	2.70	246	246	1,651	1,651	1,651
11/18/2011	2.69	2.69	2.68	2.68	244	244	1,686	1,686	1,686
11/19/2011	2.77	2.77	2.76	2.76	253	253	1,709	1,709	1,709
11/20/2011	2.85	2.85	2.84	2.84	261	261	1,794	1,794	1,794
11/21/2011	2.89	2.89	2.89	2.89	266	266	1,807	1,807	1,807
11/22/2011	2.82	2.82	2.82	2.82	261	261	1,820	1,820	1,820
11/23/2011	2.84	2.84	2.84	2.84	263	263	1,692	1,692	1,692
11/24/2011	2.75	2.75	2.74	2.74	251	251	1,693	1,693	1,693
11/25/2011	2.81	2.81	2.81	2.81	258	258	1,630	1,630	1,630
11/26/2011	2.79	2.79	2.79	2.79	256	256	1,688	1,688	1,688
11/27/2011	2.79	2.79	2.78	2.78	255	255	1,681	1,681	1,681
11/28/2011	2.77	2.77	2.76	2.76	252	252	1,674	1,674	1,674
11/29/2011	2.77	2.77	2.76	2.76	251	251	1,661	1,661	1,661
11/30/2011	2.83	2.83	2.83	2.83	260	260	1,672	1,672	1,672
12/01/2011	2.75	2.75	2.74	2.74	251	251	1,715	1,715	1,715
12/02/2011	2.81	2.81	2.80	2.80	258	258	1,671	1,671	1,671
12/03/2011	2.73	2.73	2.73	2.73	248	248	1,690	1,690	1,690
12/04/2011	2.84	2.84	2.84	2.84	262	262	1,623	1,623	1,623

Adjusted Daily Values

Date	Raw 15-min SO2 Avg	Adj. 15-min SO2 Avg	Raw 3-hr SO2 Avg	Adj. 3-hr SO2 Avg	Raw ppmv SO2 Avg	Adj. ppmv SO2 Avg	Raw Daily Rate (SO2 lb/day)	Adj. Daily Rate (SO2 lb/day)	Final Daily Rate (SO2 lb/day)
12/05/2011	2.77	2.77	2.77	2.77	255	255	1,686	1,686	1,686
12/06/2011	2.65	2.65	2.69	2.69	243	243	1,536	1,536	1,536
12/07/2011	2.80	2.80	2.80	2.80	262	262	1,252	1,252	1,252
12/08/2011	2.88	2.88	2.87	2.87	271	271	1,224	1,224	1,224
12/09/2011	2.88	2.88	2.88	2.88	269	269	1,259	1,259	1,259
12/10/2011	3.01	3.01	2.99	2.99	285	285	1,256	1,256	1,256
12/11/2011	3.00	3.00	3.00	3.00	284	284	1,307	1,307	1,307
12/12/2011	2.92	2.92	2.92	2.92	272	272	1,296	1,296	1,296
12/13/2011	2.90	2.90	2.89	2.89	270	270	1,235	1,235	1,235
12/14/2011	2.84	2.84	2.85	2.85	263	263	1,235	1,235	1,235
12/15/2011	2.82	2.82	2.82	2.82	260	260	1,214	1,214	1,214
12/16/2011	2.89	2.89	2.88	2.88	267	267	1,192	1,192	1,192
12/17/2011	2.80	2.80	2.80	2.80	255	255	1,231	1,231	1,231
12/18/2011	2.78	2.78	2.78	2.78	253	253	1,199	1,199	1,199
12/19/2011	2.83	2.83	2.82	2.82	260	260	1,187	1,187	1,187
12/20/2011	2.80	2.80	2.80	2.80	257	257	1,205	1,205	1,205
12/21/2011	2.87	2.87	2.86	2.86	262	262	1,167	1,167	1,167
12/22/2011	2.75	2.75	2.77	2.77	250	250	1,192	1,192	1,192
12/23/2011	2.76	2.76	2.75	2.75	250	250	1,142	1,142	1,142
12/24/2011	2.76	2.76	2.76	2.76	249	249	1,138	1,138	1,138
12/25/2011	2.77	2.77	2.76	2.76	251	251	1,145	1,145	1,145
12/26/2011	2.81	2.81	2.80	2.80	256	256	1,142	1,142	1,142
12/27/2011	2.86	2.86	2.86	2.86	263	263	1,164	1,164	1,164
12/28/2011	2.83	2.83	2.83	2.83	261	261	1,184	1,184	1,184
12/29/2011	2.85	2.85	2.85	2.85	262	262	1,173	1,173	1,173
12/30/2011	3.05	3.05	3.03	3.03	285	285	1,117	1,117	1,117
12/31/2011	3.01	3.01	3.01	3.01	279	279	1,145	1,145	1,145
01/01/2012	3.06	3.06	3.05	3.05	286	286	1,129	1,129	1,129
01/02/2012	3.12	3.12	3.11	3.11	293	293	1,127	1,127	1,127
01/03/2012	3.44	3.42	3.37	3.35	298	298	1,146	1,146	1,139
01/04/2012	3.14	3.14	3.15	3.15	295	295	1,154	1,154	1,154
01/05/2012	3.01	3.01	3.01	3.01	281	281	1,133	1,133	1,133
01/06/2012	3.06	3.06	3.05	3.05	285	285	1,099	1,099	1,099
01/07/2012	3.08	3.08	3.08	3.08	289	289	1,119	1,119	1,119
01/08/2012	3.01	3.01	3.00	3.00	281	281	1,132	1,132	1,132
01/09/2012	2.92	2.92	2.93	2.93	269	269	1,103	1,103	1,103
01/10/2012	2.84	2.84	2.84	2.84	259	259	1,072	1,072	1,072
01/11/2012	2.75	2.75	2.74	2.74	249	249	1,038	1,038	1,038
01/12/2012	2.95	2.95	2.96	2.96	272	272	1,000	1,000	1,000
01/13/2012	2.96	2.96	2.95	2.95	274	274	1,069	1,069	1,069
01/14/2012	2.77	2.77	2.77	2.77	250	250	1,070	1,070	1,070
01/15/2012	2.88	2.88	2.87	2.87	264	264	1,004	1,004	1,004
01/16/2012	2.82	2.82	2.83	2.83	257	257	1,044	1,044	1,044
01/17/2012	2.64	2.64	2.64	2.64	236	236	1,008	1,008	1,008
01/18/2012	2.57	2.57	2.57	2.57	229	229	944	944	944
01/19/2012	2.71	2.71	2.69	2.69	246	246	935	935	935
01/20/2012	3.05	3.05	3.04	3.04	282	282	987	987	987
01/21/2012	2.45	2.45	2.53	2.53	227	227	1,073	1,073	1,073
01/22/2012	3.34	3.34	3.30	3.30	298	298	882	882	882
01/23/2012	2.82	2.82	2.81	2.81	258	258	1,161	1,161	1,161
01/24/2012	2.94	2.94	2.92	2.92	265	265	1,177	1,177	1,177
01/25/2012	3.18	3.18	3.17	3.17	291	291	1,272	1,272	1,272
01/26/2012	3.22	3.22	3.21	3.21	296	296	1,169	1,169	1,169
01/27/2012	3.17	3.17	3.17	3.17	285	285	1,179	1,179	1,179
01/28/2012	3.32	3.32	3.31	3.31	305	305	1,114	1,114	1,114
01/29/2012	3.35	3.35	3.35	3.35	310	310	1,167	1,167	1,167
01/30/2012	3.42	3.42	3.41	3.41	317	317	1,184	1,184	1,184
01/31/2012	3.27	3.27	3.27	3.27	299	299	1,212	1,212	1,212
02/01/2012	3.32	3.32	3.31	3.31	306	306	1,160	1,160	1,160
02/02/2012	3.31	3.31	3.30	3.30	304	304	1,174	1,174	1,174
02/03/2012	3.39	3.39	3.39	3.39	315	315	1,174	1,174	1,174
02/04/2012	3.37	3.37	3.37	3.37	311	311	1,205	1,205	1,205

Adjusted Daily Values

Date	Raw 15-min SO2 Avg	Adj. 15-min SO2 Avg	Raw 3-hr SO2 Avg	Adj. 3-hr SO2 Avg	Raw ppmv SO2 Avg	Adj. ppmv SO2 Avg	Raw Daily Rate (SO2 lb/day)	Adj. Daily Rate (SO2 lb/day)	Final Daily Rate (SO2 lb/day)
02/05/2012	3.36	3.36	3.36	3.36	309	309	1,185	1,185	1,185
02/06/2012	1.05	3.98	0.99	3.06	339	330	1,182	1,182	1,153
02/07/2012	3.04	3.13	3.07	3.07	288	288	1,127	1,127	1,127
02/08/2012	2.76	2.76	2.76	2.76	250	250	1,197	1,197	1,197
02/09/2012	2.78	2.78	2.78	2.78	254	254	1,051	1,051	1,051
02/10/2012	2.70	2.70	2.69	2.69	246	246	1,056	1,056	1,056
02/11/2012	2.70	2.70	2.70	2.70	246	246	1,024	1,024	1,024
02/12/2012	2.64	2.64	2.64	2.64	240	240	1,026	1,026	1,026
02/13/2012	2.61	2.61	2.61	2.61	236	236	1,000	1,000	1,000
02/14/2012	2.62	2.62	2.61	2.61	237	237	993	993	993
02/15/2012	2.43	2.43	2.45	2.45	217	217	993	993	993
02/16/2012	2.58	2.58	2.56	2.56	234	234	933	933	933
02/17/2012	2.75	2.75	2.74	2.74	253	253	976	976	976
02/18/2012	2.66	2.66	2.66	2.66	241	241	1,060	1,060	1,060
02/19/2012	2.62	2.62	2.62	2.62	236	236	1,028	1,028	1,028
02/20/2012	2.58	2.58	2.57	2.57	231	231	1,015	1,015	1,015
02/21/2012	2.51	2.51	2.51	2.51	224	224	998	998	998
02/22/2012	2.47	2.47	2.47	2.47	219	219	973	973	973
02/23/2012	2.51	2.51	2.51	2.51	226	226	947	947	947
02/24/2012	2.56	2.56	2.55	2.55	231	231	951	951	951
02/25/2012	2.60	2.60	2.60	2.60	235	235	962	962	962
02/26/2012	2.65	2.65	2.64	2.64	241	241	968	968	968
02/27/2012	2.70	2.70	2.69	2.69	246	246	987	987	987
02/28/2012	2.60	2.60	2.60	2.60	235	235	1,004	1,004	1,004
02/29/2012	2.78	2.78	2.78	2.78	255	255	970	970	970
03/01/2012	2.78	2.78	2.77	2.77	256	256	1,098	1,098	1,098
03/02/2012	2.72	2.72	2.74	2.74	249	249	1,101	1,101	1,101
03/03/2012	2.61	2.61	2.63	2.62	229	229	1,065	1,065	1,060
03/04/2012	2.29	2.29	2.27	2.27	201	201	964	964	964
03/05/2012	3.57	3.08	3.55	2.79	226	221	839	839	658
03/06/2012	2.93	2.93	2.90	2.90	263	263	778	778	778
03/07/2012	3.11	3.11	3.10	3.10	278	278	1,041	1,041	1,041
03/08/2012	3.14	3.14	3.14	3.14	285	285	1,122	1,122	1,122
03/09/2012	3.15	3.15	3.15	3.15	285	285	1,131	1,131	1,131
03/10/2012	3.22	3.22	3.21	3.21	295	295	1,129	1,129	1,129
03/11/2012	3.16	3.16	3.16	3.16	287	287	1,149	1,149	1,149
03/12/2012	3.13	3.13	3.13	3.13	283	283	1,082	1,082	1,082
03/13/2012	3.19	3.19	3.19	3.19	289	289	1,123	1,123	1,123
03/14/2012	3.09	3.09	3.10	3.10	277	277	1,153	1,153	1,153
03/15/2012	2.97	2.97	2.96	2.96	269	269	1,146	1,146	1,146
03/16/2012	3.04	3.04	3.03	3.03	276	276	1,245	1,245	1,245
03/17/2012	3.17	3.17	3.17	3.17	290	290	1,490	1,490	1,490
03/18/2012	2.97	2.97	2.97	2.97	268	268	1,728	1,728	1,728
03/19/2012	2.98	2.98	2.98	2.98	271	271	1,489	1,489	1,489
03/20/2012	3.13	3.13	3.10	3.10	288	288	1,355	1,355	1,355
03/21/2012	3.16	3.16	3.15	3.15	289	289	1,487	1,487	1,487
03/22/2012	3.07	3.07	3.10	3.10	280	280	1,450	1,450	1,450
03/23/2012	2.83	2.83	2.81	2.81	256	256	1,578	1,578	1,578
03/24/2012	2.96	2.96	2.95	2.95	270	270	1,507	1,507	1,507
03/25/2012	3.12	3.12	3.11	3.11	285	285	1,618	1,618	1,618
03/26/2012	3.19	3.19	3.19	3.19	291	291	1,716	1,716	1,716
03/27/2012	3.25	3.25	3.24	3.24	299	299	1,760	1,760	1,760
03/28/2012	3.05	3.05	3.06	3.06	279	279	1,800	1,800	1,800
03/29/2012	2.99	2.99	2.98	2.98	275	275	1,680	1,680	1,680
03/30/2012	2.97	2.97	2.98	2.98	273	273	1,646	1,646	1,646
03/31/2012	2.90	2.90	2.89	2.89	264	264	1,665	1,665	1,665
04/01/2012	2.97	2.97	2.96	2.96	272	272	1,759	1,759	1,759
04/02/2012	2.97	2.97	2.97	2.97	272	272	1,787	1,787	1,787
04/03/2012	2.98	2.98	3.06	3.06	269	269	1,784	1,784	1,784
04/04/2012	3.18	3.18	3.16	3.16	291	291	1,786	1,786	1,786
04/05/2012	2.97	2.97	3.01	3.01	269	269	1,916	1,916	1,916
04/06/2012	2.80	2.80	2.80	2.80	253	253	1,667	1,667	1,667

Adjusted Daily Values

Date	Raw 15-min SO2 Avg	Adj. 15-min SO2 Avg	Raw 3-hr SO2 Avg	Adj. 3-hr SO2 Avg	Raw ppmv SO2 Avg	Adj. ppmv SO2 Avg	Raw Daily Rate (SO2 lb/day)	Adj. Daily Rate (SO2 lb/day)	Final Daily Rate (SO2 lb/day)
04/07/2012	3.00	3.00	2.98	2.98	277	277	1,477	1,477	1,477
04/08/2012	2.97	2.97	2.97	2.97	275	275	1,585	1,585	1,585
04/09/2012	2.95	2.95	2.94	2.94	271	271	1,559	1,559	1,559
04/10/2012	2.98	2.98	2.97	2.97	275	275	1,550	1,550	1,550
04/11/2012	2.97	2.97	2.97	2.97	273	273	1,562	1,562	1,562
04/12/2012	3.07	3.07	3.05	3.05	279	279	1,558	1,558	1,558
04/13/2012	3.06	3.06	3.07	3.07	275	275	1,613	1,613	1,613
04/14/2012	2.89	2.89	2.89	2.89	262	262	1,579	1,579	1,579
04/15/2012	2.85	2.85	2.85	2.85	257	257	1,515	1,515	1,515
04/16/2012	2.83	2.83	2.82	2.82	255	255	1,488	1,488	1,488
04/17/2012	4.93	4.48	4.95	3.26	278	278	1,481	1,481	975
04/18/2012	3.10	3.10	3.10	3.10	285	285	1,300	1,300	1,300
04/19/2012	3.06	3.06	3.05	3.05	281	281	1,680	1,680	1,680
04/20/2012	3.14	3.14	3.14	3.14	288	288	1,741	1,741	1,741
04/21/2012	3.13	3.13	3.13	3.13	286	286	1,861	1,861	1,861
04/22/2012	3.16	3.16	3.14	3.14	288	288	1,891	1,891	1,891
04/23/2012	3.20	3.20	3.19	3.19	290	290	1,936	1,936	1,936
04/24/2012	3.15	3.15	3.16	3.16	284	284	1,950	1,950	1,950
04/25/2012	3.11	3.11	3.10	3.10	283	283	1,905	1,905	1,905
04/26/2012	3.09	3.09	3.09	3.09	279	279	1,886	1,886	1,886
04/27/2012	3.10	3.10	3.10	3.10	284	284	1,861	1,861	1,861
04/28/2012	3.12	3.12	3.12	3.12	289	289	1,846	1,846	1,846
04/29/2012	3.12	3.12	3.11	3.11	287	287	1,873	1,873	1,873
04/30/2012	3.12	3.12	3.12	3.12	288	288	1,873	1,873	1,873
05/01/2012	2.87	3.10	2.87	2.87	289	289	1,867	1,867	1,867
05/02/2012	3.15	3.15	3.13	3.13	289	289	1,872	1,872	1,872
05/03/2012	3.18	3.18	3.19	3.19	292	292	1,880	1,880	1,880
05/04/2012	3.05	3.05	3.05	3.05	278	278	1,887	1,887	1,887
05/05/2012	3.07	3.07	3.08	3.08	281	281	1,806	1,806	1,806
05/06/2012	2.99	2.99	2.99	2.99	273	273	1,820	1,820	1,820
05/07/2012	2.99	2.99	2.98	2.98	273	273	1,782	1,782	1,782
05/08/2012	2.96	2.96	2.97	2.97	271	271	1,786	1,786	1,786
05/09/2012	2.92	2.92	2.92	2.92	267	267	1,769	1,769	1,769
05/10/2012	2.97	2.97	2.96	2.96	272	272	1,752	1,752	1,752
05/11/2012	2.89	2.89	2.90	2.90	263	263	1,819	1,819	1,819
05/12/2012	2.93	2.93	2.91	2.91	264	264	1,858	1,858	1,858
05/13/2012	3.08	3.08	3.06	3.06	278	278	1,901	1,901	1,901
05/14/2012	3.15	3.15	3.15	3.15	286	286	2,018	2,018	2,018
05/15/2012	3.22	3.22	3.21	3.21	295	295	2,083	2,083	2,083
05/16/2012	3.20	3.20	3.22	3.22	290	290	2,152	2,152	2,152
05/17/2012	2.98	2.98	2.98	2.98	271	271	2,113	2,113	2,113
05/18/2012	3.06	3.06	3.04	3.04	281	281	1,825	1,825	1,825
05/19/2012	3.22	3.22	3.21	3.21	297	297	1,674	1,674	1,674
05/20/2012	3.29	3.29	3.29	3.29	306	306	2,081	2,081	2,081
05/21/2012	3.18	3.18	3.19	3.19	291	291	2,158	2,158	2,158
05/22/2012	3.20	3.20	3.20	3.20	292	292	2,069	2,069	2,069
05/23/2012	3.19	3.19	3.18	3.18	291	291	2,075	2,075	2,075
05/24/2012	5.45	4.06	5.45	3.37	335	330	2,069	2,069	1,281
05/25/2012	3.32	3.32	3.32	3.32	306	306	1,948	1,948	1,948
05/26/2012	3.38	3.38	3.38	3.38	312	312	2,127	2,127	2,127
05/27/2012	3.40	3.40	3.40	3.40	314	314	2,199	2,199	2,199
05/28/2012	3.35	3.35	3.34	3.34	309	309	2,205	2,205	2,205
05/29/2012	3.33	3.33	3.33	3.33	306	306	2,178	2,178	2,178
05/30/2012	3.20	3.20	3.20	3.20	293	293	2,162	2,162	2,162
05/31/2012	3.22	3.22	3.22	3.22	296	296	2,083	2,083	2,083
06/01/2012	3.11	3.11	3.04	3.04	269	269	2,100	2,100	2,100
06/02/2012	3.30	3.30	3.30	3.30	301	301	1,488	1,488	1,488
06/03/2012	3.25	3.25	3.26	3.26	295	295	2,161	2,161	2,161
06/04/2012	3.34	3.34	3.33	3.33	305	305	2,134	2,134	2,134
06/05/2012	3.22	3.36	3.28	3.28	314	314	2,191	2,191	2,191
06/06/2012	3.25	3.25	3.26	3.26	298	298	2,232	2,232	2,232
06/07/2012	3.15	3.15	3.15	3.15	287	287	2,144	2,144	2,144

Adjusted Daily Values

Date	Raw 15-min SO2 Avg	Adj. 15-min SO2 Avg	Raw 3-hr SO2 Avg	Adj. 3-hr SO2 Avg	Raw ppmv SO2 Avg	Adj. ppmv SO2 Avg	Raw Daily Rate (SO2 lb/day)	Adj. Daily Rate (SO2 lb/day)	Final Daily Rate (SO2 lb/day)
06/08/2012	3.24	3.24	3.23	3.23	297	297	2,081	2,081	2,081
06/09/2012	3.15	3.15	3.15	3.15	287	287	2,140	2,140	2,140
06/10/2012	3.27	3.27	3.25	3.25	298	298	2,081	2,081	2,081
06/11/2012	3.25	3.25	3.25	3.25	293	293	2,164	2,164	2,164
06/12/2012	3.04	3.04	3.05	3.05	273	273	2,137	2,137	2,137
06/13/2012	3.07	3.07	3.06	3.06	278	278	2,000	2,000	2,000
06/14/2012	3.10	3.10	3.09	3.09	280	280	2,024	2,024	2,024
06/15/2012	2.93	2.93	2.94	2.94	265	265	2,047	2,047	2,047
06/16/2012	2.77	2.77	2.77	2.77	253	253	1,932	1,932	1,932
06/17/2012	2.90	2.90	2.87	2.87	263	263	1,822	1,822	1,822
06/18/2012	2.98	2.98	3.00	3.00	268	268	1,916	1,916	1,916
06/19/2012	0.00	0.00	0.00	0.00	0	0	0	0	0
06/20/2012	69.98	21.16	69.19	4.00	157	157	156	156	9
06/21/2012	16.33	7.43	17.60	2.99	54	54	87	87	15
06/22/2012	75.07	11.86	74.71	3.75	334	334	89	89	4
06/23/2012	3.18	3.18	3.16	3.16	292	292	882	882	882
06/24/2012	3.38	3.38	3.37	3.37	314	314	1,935	1,935	1,935
06/25/2012	3.36	3.36	3.35	3.35	312	312	2,278	2,278	2,278
06/26/2012	3.46	3.46	3.46	3.46	325	325	2,274	2,274	2,274
06/27/2012	3.43	3.43	3.43	3.43	323	323	2,359	2,359	2,359
06/28/2012	3.43	3.43	3.43	3.43	322	322	2,332	2,332	2,332
06/29/2012	3.35	3.35	3.34	3.34	311	311	2,325	2,325	2,325
06/30/2012	3.42	3.42	3.42	3.42	319	319	2,270	2,270	2,270
07/01/2012	3.42	3.42	3.41	3.41	320	320	2,328	2,328	2,328
07/02/2012	3.41	3.41	3.41	3.41	318	318	2,340	2,340	2,340
07/03/2012	3.42	3.42	3.43	3.43	311	311	2,320	2,320	2,320
07/04/2012	3.48	3.48	3.47	3.47	323	323	2,270	2,270	2,270
07/05/2012	3.45	3.45	3.44	3.44	319	319	2,347	2,347	2,347
07/06/2012	3.45	3.45	3.45	3.45	319	319	2,338	2,338	2,338
07/07/2012	3.37	3.37	3.37	3.37	310	310	2,331	2,331	2,331
07/08/2012	3.34	3.34	3.34	3.34	307	307	2,259	2,259	2,259
07/09/2012	3.35	3.35	3.35	3.35	307	307	2,240	2,240	2,240
07/10/2012	3.43	3.43	3.42	3.42	318	318	2,237	2,237	2,237
07/11/2012	3.43	3.43	3.43	3.43	318	318	2,299	2,299	2,299
07/12/2012	3.38	3.38	3.38	3.38	313	313	2,289	2,289	2,289
07/13/2012	3.39	3.39	3.37	3.37	311	311	2,252	2,252	2,252
07/14/2012	3.43	3.43	3.43	3.43	316	316	2,273	2,273	2,273
07/15/2012	3.47	3.47	3.46	3.46	321	321	2,306	2,306	2,306
07/16/2012	3.44	3.44	3.44	3.44	318	318	2,329	2,329	2,329
07/17/2012	3.07	3.07	3.14	3.14	276	276	2,327	2,327	2,327
07/18/2012	3.43	3.43	3.42	3.42	316	316	1,688	1,688	1,688
07/19/2012	3.48	3.48	3.48	3.48	320	320	2,235	2,235	2,235
07/20/2012	3.39	3.39	3.38	3.38	307	307	2,322	2,322	2,322
07/21/2012	3.52	3.52	3.52	3.52	323	323	1,633	1,633	1,633
07/22/2012	3.42	3.42	3.42	3.42	304	304	2,326	2,326	2,326
07/23/2012	3.39	3.39	3.39	3.39	311	311	2,199	2,199	2,199
07/24/2012	3.48	3.48	3.47	3.47	322	322	2,250	2,250	2,250
07/25/2012	3.49	3.49	3.48	3.48	323	323	2,336	2,336	2,336
07/26/2012	3.43	3.43	3.43	3.43	317	317	2,344	2,344	2,344
07/27/2012	3.33	3.33	3.32	3.32	305	305	2,302	2,302	2,302
07/28/2012	3.47	3.47	3.46	3.46	322	322	2,225	2,225	2,225
07/29/2012	3.44	3.44	3.44	3.44	320	320	2,340	2,340	2,340
07/30/2012	3.48	3.48	3.48	3.48	325	325	2,322	2,322	2,322
07/31/2012	3.48	3.48	3.48	3.48	324	324	2,340	2,340	2,340
08/01/2012	3.50	3.50	3.49	3.49	325	325	2,339	2,339	2,339
08/02/2012	79.33	11.41	76.74	3.65	370	350	0	0	0
08/03/2012	3.21	3.21	3.19	3.19	292	292	699	699	699
08/04/2012	3.14	3.14	3.14	3.14	282	282	1,365	1,365	1,365
08/05/2012	3.17	3.17	3.17	3.17	286	286	1,362	1,362	1,362
08/06/2012	3.14	3.14	3.15	3.15	283	283	1,371	1,371	1,371
08/07/2012	2.71	3.37	2.65	3.03	314	314	1,486	1,486	1,486
08/08/2012	3.44	3.44	3.44	3.44	318	318	2,317	2,317	2,317

Adjusted Daily Values

Date	Raw 15-min SO2 Avg	Adj. 15-min SO2 Avg	Raw 3-hr SO2 Avg	Adj. 3-hr SO2 Avg	Raw ppmv SO2 Avg	Adj. ppmv SO2 Avg	Raw Daily Rate (SO2 lb/day)	Adj. Daily Rate (SO2 lb/day)	Final Daily Rate (SO2 lb/day)
08/09/2012	3.37	3.37	3.37	3.37	299	299	2,335	2,335	2,335
08/10/2012	3.41	3.41	3.40	3.40	316	316	1,989	1,989	1,989
08/11/2012	3.50	3.50	3.49	3.49	323	323	2,276	2,276	2,276
08/12/2012	4.06	3.69	4.02	3.55	318	318	2,368	2,368	2,092
08/13/2012	3.44	3.44	3.44	3.44	316	316	2,323	2,323	2,323
08/14/2012	3.25	3.25	3.25	3.25	297	297	2,310	2,310	2,310
08/15/2012	3.39	3.39	3.37	3.37	306	306	2,154	2,154	2,154
08/16/2012	3.34	3.34	3.33	3.33	299	299	2,207	2,207	2,207
08/17/2012	3.36	3.36	3.36	3.36	305	305	1,918	1,918	1,918
08/18/2012	3.49	3.49	3.49	3.49	320	320	1,520	1,520	1,520
08/19/2012	3.52	3.52	3.52	3.52	324	324	1,584	1,584	1,584
08/20/2012	3.52	3.52	3.51	3.51	323	323	1,598	1,598	1,598
08/21/2012	3.54	3.54	3.54	3.54	325	325	1,593	1,593	1,593
08/22/2012	3.52	3.52	3.51	3.51	322	322	1,601	1,601	1,601
08/23/2012	3.48	3.48	3.49	3.49	317	317	1,580	1,580	1,580
08/24/2012	3.42	3.42	3.42	3.42	309	309	1,563	1,563	1,563
08/25/2012	2.98	3.67	3.34	3.39	318	318	1,535	1,535	1,535
08/26/2012	3.23	3.23	2.82	3.00	291	291	1,569	1,569	1,569
08/27/2012	3.26	3.26	3.23	3.23	297	297	1,455	1,455	1,455
08/28/2012	3.15	3.15	3.17	3.17	283	283	1,442	1,442	1,442
08/29/2012	3.24	3.24	3.22	3.22	296	296	1,349	1,349	1,349
08/30/2012	3.27	3.27	3.26	3.26	300	300	1,438	1,438	1,438
08/31/2012	3.28	3.28	3.28	3.28	299	299	1,484	1,484	1,484
09/01/2012	3.22	3.22	3.22	3.22	291	291	1,484	1,484	1,484
09/02/2012	3.10	3.10	3.10	3.10	278	278	1,453	1,453	1,453
09/03/2012	3.09	3.09	3.08	3.08	279	279	1,400	1,400	1,400
09/04/2012	3.25	3.25	3.24	3.23	284	284	1,401	1,401	1,396
09/05/2012	3.03	3.03	3.02	3.02	272	272	1,417	1,417	1,417
09/06/2012	3.29	3.29	3.30	3.30	306	306	1,369	1,369	1,369
09/07/2012	3.08	3.08	3.07	3.07	278	278	1,530	1,530	1,530
09/08/2012	3.36	3.36	3.34	3.34	309	309	1,642	1,642	1,642
09/09/2012	3.30	3.30	3.31	3.31	299	299	2,181	2,181	2,181
09/10/2012	3.29	3.29	3.29	3.29	297	297	2,201	2,201	2,201
09/11/2012	3.33	3.33	3.32	3.32	302	302	2,203	2,203	2,203
09/12/2012	3.29	3.29	3.29	3.29	297	297	2,231	2,231	2,231
09/13/2012	3.32	3.32	3.31	3.31	302	302	2,200	2,200	2,200
09/14/2012	3.39	3.39	3.39	3.39	312	312	2,218	2,218	2,218
09/15/2012	3.39	3.39	3.38	3.38	312	312	2,267	2,267	2,267
09/16/2012	3.16	3.16	3.18	3.18	290	290	2,268	2,268	2,268
09/17/2012	3.25	3.25	3.24	3.24	301	301	1,801	1,801	1,801
09/18/2012	3.31	3.31	3.31	3.31	304	304	1,859	1,859	1,859
09/19/2012	3.36	3.36	3.35	3.35	308	308	2,103	2,103	2,103
09/20/2012	3.37	3.37	3.38	3.38	310	310	2,132	2,132	2,132
09/21/2012	3.32	3.32	3.31	3.31	304	304	2,139	2,139	2,139
09/22/2012	0.00	0.00	0.00	0.00	0	0	0	0	0
09/23/2012	0.00	0.00	0.00	0.00	0	0	0	0	0
09/24/2012	0.00	0.00	0.00	0.00	0	0	0	0	0
09/25/2012	0.00	0.00	0.00	0.00	0	0	0	0	0
09/26/2012	0.00	0.00	0.00	0.00	0	0	0	0	0
09/27/2012	0.00	0.00	0.00	0.00	0	0	0	0	0
09/28/2012	0.00	0.00	0.00	0.00	0	0	0	0	0
09/29/2012	0.00	0.00	0.00	0.00	0	0	0	0	0
09/30/2012	0.00	0.00	0.00	0.00	0	0	0	0	0
10/01/2012	0.00	0.00	0.00	0.00	0	0	0	0	0
10/02/2012	0.00	0.00	0.00	0.00	0	0	0	0	0
10/03/2012	0.00	0.00	0.00	0.00	0	0	0	0	0
10/04/2012	0.00	0.00	0.00	0.00	0	0	0	0	0
10/05/2012	0.00	0.00	0.00	0.00	0	0	0	0	0
10/06/2012	0.00	0.00	0.00	0.00	0	0	0	0	0
10/07/2012	0.00	0.00	0.00	0.00	0	0	0	0	0
10/08/2012	0.00	0.00	0.00	0.00	0	0	0	0	0
10/09/2012	0.00	0.00	0.00	0.00	0	0	0	0	0

Adjusted Daily Values

Date	Raw 15-min SO2 Avg	Adj. 15-min SO2 Avg	Raw 3-hr SO2 Avg	Adj. 3-hr SO2 Avg	Raw ppmv SO2 Avg	Adj. ppmv SO2 Avg	Raw Daily Rate (SO2 lb/day)	Adj. Daily Rate (SO2 lb/day)	Final Daily Rate (SO2 lb/day)
10/10/2012	0.00	0.00	0.00	0.00	0	0	0	0	0
10/11/2012	0.00	0.00	0.00	0.00	0	0	0	0	0
10/12/2012	0.00	0.00	0.00	0.00	0	0	0	0	0
10/13/2012	2675.62	21.50	2392.41	4.00	1,625	1,358	0	0	0
10/14/2012	180.85	16.25	267.45	4.00	1,519	1,069	311	311	5
10/15/2012	159.68	15.61	159.45	4.00	427	427	525	525	13
10/16/2012	32.25	6.89	32.61	3.47	481	404	493	493	52
10/17/2012	3.21	3.21	3.21	3.21	286	286	1,732	1,732	1,732
10/18/2012	25.58	11.69	16.79	3.56	548	469	1,654	1,654	351
10/19/2012	19.33	17.13	19.71	4.00	319	315	1,673	1,673	340
10/20/2012	8.10	8.10	8.67	3.42	224	224	2,261	2,261	891
10/21/2012	2.90	2.90	2.88	2.88	250	250	1,408	1,408	1,408
10/22/2012	3.15	3.15	3.14	3.14	289	289	1,512	1,512	1,512
10/23/2012	3.10	3.10	3.10	3.10	278	278	1,762	1,762	1,762
10/24/2012	3.28	3.28	3.27	3.27	301	301	2,252	2,252	2,252
10/25/2012	3.21	3.21	3.22	3.22	293	293	1,833	1,833	1,833
10/26/2012	3.20	3.20	3.19	3.19	293	293	1,785	1,785	1,785
10/27/2012	3.26	3.26	3.27	3.27	297	297	1,784	1,784	1,784
10/28/2012	3.00	3.00	2.99	2.99	267	267	1,816	1,816	1,816
10/29/2012	3.01	3.01	3.01	3.01	269	269	1,670	1,670	1,670
10/30/2012	3.06	3.06	3.06	3.06	276	276	1,671	1,671	1,671
10/31/2012	3.17	3.17	3.15	3.15	288	288	1,702	1,702	1,702
11/01/2012	3.21	3.21	3.21	3.21	293	293	1,763	1,763	1,763
11/02/2012	3.26	3.26	3.26	3.26	299	299	1,786	1,786	1,786
11/03/2012	3.20	3.20	3.20	3.20	293	293	1,809	1,809	1,809
11/04/2012	3.15	3.15	3.15	3.15	287	287	1,778	1,778	1,778
11/05/2012	3.15	3.15	3.14	3.14	288	288	1,746	1,746	1,746
11/06/2012	3.25	3.25	3.25	3.25	296	296	1,742	1,742	1,742
11/07/2012	3.39	3.39	3.37	3.37	310	310	1,775	1,775	1,775
11/08/2012	3.41	3.41	3.41	3.41	311	311	1,879	1,879	1,879
11/09/2012	3.47	3.47	3.47	3.47	316	316	1,908	1,908	1,908
11/10/2012	3.53	3.53	3.53	3.53	324	324	1,934	1,934	1,934
11/11/2012	3.46	3.46	3.45	3.45	316	316	1,960	1,960	1,960
11/12/2012	3.48	3.48	3.48	3.48	320	320	1,915	1,915	1,915
11/13/2012	3.34	3.34	3.34	3.34	304	304	1,924	1,924	1,924
11/14/2012	3.36	3.36	3.35	3.35	304	304	1,850	1,850	1,850
11/15/2012	3.32	3.32	3.35	3.35	300	300	1,883	1,883	1,883
11/16/2012	3.37	3.37	3.36	3.36	298	298	1,919	1,919	1,919
11/17/2012	3.36	3.36	3.35	3.35	300	300	1,907	1,907	1,907
11/18/2012	3.45	3.45	3.45	3.45	313	313	1,957	1,957	1,957
11/19/2012	3.36	3.36	3.36	3.36	305	305	2,006	2,006	2,006
11/20/2012	3.38	3.38	3.37	3.37	306	306	1,947	1,947	1,947
11/21/2012	3.24	3.24	3.25	3.25	291	291	1,955	1,955	1,955
11/22/2012	3.25	3.25	3.25	3.25	292	292	1,880	1,880	1,880
11/23/2012	3.21	3.21	3.21	3.21	285	285	1,877	1,877	1,877
11/24/2012	3.22	3.22	3.20	3.20	286	286	1,847	1,847	1,847
11/25/2012	3.33	3.33	3.34	3.34	299	299	1,847	1,847	1,847
11/26/2012	3.23	3.23	3.24	3.24	288	288	1,930	1,930	1,930
11/27/2012	3.34	3.34	3.33	3.33	298	298	1,866	1,866	1,866
11/28/2012	3.52	3.52	3.51	3.51	318	318	1,920	1,920	1,920
11/29/2012	3.52	3.52	3.52	3.52	318	318	2,036	2,036	2,036
11/30/2012	3.51	3.51	3.52	3.52	317	317	2,041	2,041	2,041
12/01/2012	3.33	3.33	3.33	3.33	301	301	2,054	2,054	2,054
12/02/2012	3.42	3.42	3.42	3.42	310	310	1,946	1,946	1,946
12/03/2012	3.37	3.37	3.36	3.36	305	305	1,911	1,911	1,911
12/04/2012	30965.01	12.17	27035.37	3.80	984	704	1,708	1,708	0
12/05/2012	2960.27	14.71	7061.26	3.43	719	462	696	696	0
12/06/2012	39.23	12.75	100.52	3.80	218	218	34	34	1
12/07/2012	2957.55	6.28	2570.46	3.35	228	228	545	545	1
12/08/2012	3.14	3.14	3.12	3.12	292	292	823	823	823
12/09/2012	3.00	3.00	3.00	3.00	278	278	1,410	1,410	1,410
12/10/2012	2.49	2.49	2.51	2.51	223	223	1,350	1,350	1,350

Adjusted Daily Values

Date	Raw 15-min SO2 Avg	Adj. 15-min SO2 Avg	Raw 3-hr SO2 Avg	Adj. 3-hr SO2 Avg	Raw ppmv SO2 Avg	Adj. ppmv SO2 Avg	Raw Daily Rate (SO2 lb/day)	Adj. Daily Rate (SO2 lb/day)	Final Daily Rate (SO2 lb/day)
12/11/2012	2.85	2.85	2.82	2.82	260	260	1,067	1,067	1,067
12/12/2012	2.91	2.91	2.90	2.90	262	262	1,097	1,097	1,097
12/13/2012	3.03	3.03	3.05	3.05	276	276	1,049	1,049	1,049
12/14/2012	3.03	3.03	3.00	3.00	276	276	1,078	1,078	1,078
12/15/2012	2.92	2.92	2.92	2.92	265	265	1,049	1,049	1,049
12/16/2012	3.12	3.12	3.11	3.11	285	285	1,007	1,007	1,007
12/17/2012	3.10	3.10	3.11	3.11	283	283	1,071	1,071	1,071
12/18/2012	3.10	3.10	3.10	3.10	283	283	1,070	1,070	1,070
12/19/2012	2.58	2.58	2.62	2.62	233	233	1,060	1,060	1,060
12/20/2012	2.58	2.58	2.56	2.56	237	237	1,075	1,075	1,075
12/21/2012	2.47	2.47	2.47	2.47	225	225	1,453	1,453	1,453
12/22/2012	2.50	2.50	2.49	2.49	226	226	1,393	1,393	1,393
12/23/2012	2.51	2.51	2.51	2.51	228	228	1,406	1,406	1,406
12/24/2012	2.46	2.46	2.47	2.47	221	221	1,418	1,418	1,418
12/25/2012	2.43	2.43	2.41	2.41	221	221	1,377	1,377	1,377
12/26/2012	2.47	2.47	2.46	2.46	224	224	1,359	1,359	1,359
12/27/2012	2.45	2.45	2.46	2.46	221	221	1,386	1,386	1,386
12/28/2012	2.38	2.38	2.36	2.36	215	215	1,232	1,232	1,232
12/29/2012	2.64	2.64	2.64	2.64	240	240	1,048	1,048	1,048
12/30/2012	2.62	2.62	2.60	2.60	240	240	1,165	1,165	1,165
12/31/2012	2.56	2.56	2.58	2.58	230	230	1,087	1,087	1,087
01/01/2013	3.01	3.01	3.00	3.00	274	274	833	833	833
01/02/2013	3.01	3.01	3.00	3.00	272	272	1,084	1,084	1,084
01/03/2013	2.98	2.98	2.98	2.98	270	270	1,089	1,089	1,089
01/04/2013	2.99	2.99	2.98	2.98	272	272	1,077	1,077	1,077
01/05/2013	3.00	3.00	3.05	3.05	271	271	1,077	1,077	1,077
01/06/2013	2.89	2.89	2.82	2.82	258	258	1,057	1,057	1,057
01/07/2013	3.29	3.29	3.32	3.32	300	300	986	986	986
01/08/2013	2.54	2.69	2.56	2.56	245	245	1,172	1,172	1,172
01/09/2013	5.85	3.15	5.85	2.71	210	210	965	965	446
01/10/2013	2.39	2.39	2.40	2.40	217	217	723	723	723
01/11/2013	2.26	2.26	2.26	2.26	203	203	865	865	865
01/12/2013	9.87	5.08	9.96	2.92	237	237	837	837	246
01/13/2013	2.36	2.36	2.37	2.37	213	213	709	709	709
01/14/2013	2.47	2.47	2.46	2.46	225	225	839	839	839
01/15/2013	3.06	3.06	3.02	2.80	225	225	876	876	812
01/16/2013	2.73	2.73	2.74	2.74	250	250	841	841	841
01/17/2013	2.69	2.69	2.68	2.68	245	245	978	978	978
01/18/2013	2.55	2.55	2.55	2.55	230	230	958	958	958
01/19/2013	2.51	2.51	2.51	2.51	225	225	903	903	903
01/20/2013	2.52	2.52	2.50	2.50	227	227	899	899	899
01/21/2013	2.67	2.67	2.67	2.67	242	242	909	909	909
01/22/2013	2.74	2.74	2.73	2.73	250	250	967	967	967
01/23/2013	2.87	2.87	2.88	2.88	262	262	988	988	988
01/24/2013	2.74	2.74	2.74	2.74	248	248	1,033	1,033	1,033
01/25/2013	2.75	2.75	2.75	2.75	251	251	989	989	989
01/26/2013	2.77	2.77	2.76	2.76	254	254	1,000	1,000	1,000
01/27/2013	2.68	2.68	2.68	2.68	242	242	1,006	1,006	1,006
01/28/2013	2.74	2.74	2.74	2.74	250	250	956	956	956
01/29/2013	2.68	2.68	2.68	2.68	243	243	989	989	989
01/30/2013	2.68	2.68	2.66	2.66	245	245	962	962	962
01/31/2013	2.72	2.72	2.71	2.71	247	247	960	960	960
02/01/2013	2.60	2.60	2.61	2.61	235	235	973	973	973
02/02/2013	2.70	2.70	2.70	2.70	245	245	924	924	924
02/03/2013	2.80	2.80	2.80	2.80	256	256	965	965	965
02/04/2013	2.60	2.60	2.59	2.59	235	235	1,004	1,004	1,004
02/05/2013	10.48	2.82	11.69	2.78	238	238	934	934	222
02/06/2013	2.74	2.74	2.75	2.75	250	250	951	951	951
02/07/2013	2.71	2.71	2.70	2.70	245	245	991	991	991
02/08/2013	2.63	2.63	2.64	2.64	239	239	965	965	965
02/09/2013	2.54	2.54	2.55	2.55	230	230	767	767	767
02/10/2013	2.51	2.51	2.50	2.50	226	226	934	934	934

Adjusted Daily Values

Date	Raw 15-min SO2 Avg	Adj. 15-min SO2 Avg	Raw 3-hr SO2 Avg	Adj. 3-hr SO2 Avg	Raw ppmv SO2 Avg	Adj. ppmv SO2 Avg	Raw Daily Rate (SO2 lb/day)	Adj. Daily Rate (SO2 lb/day)	Final Daily Rate (SO2 lb/day)
02/11/2013	2.51	2.51	2.51	2.51	228	228	913	913	913
02/12/2013	2.38	2.38	2.39	2.39	215	215	910	910	910
02/13/2013	2.31	2.31	2.31	2.31	211	211	935	935	935
02/14/2013	2.20	2.20	2.19	2.19	199	199	1,040	1,040	1,040
02/15/2013	2.18	2.18	2.18	2.18	198	198	991	991	991
02/16/2013	2.13	2.13	2.13	2.13	193	193	1,039	1,039	1,039
02/17/2013	2.11	2.11	2.11	2.11	190	190	1,067	1,067	1,067
02/18/2013	2.21	2.21	2.19	2.19	200	200	1,059	1,059	1,059
02/19/2013	2.14	2.14	2.14	2.14	193	193	1,101	1,101	1,101
02/20/2013	2.24	2.24	2.23	2.23	204	204	1,074	1,074	1,074
02/21/2013	2.23	2.23	2.23	2.23	204	204	1,121	1,121	1,121
02/22/2013	2.18	2.18	2.18	2.18	199	199	1,184	1,184	1,184
02/23/2013	2.37	2.37	2.36	2.36	219	219	1,289	1,289	1,289
02/24/2013	2.30	2.30	2.30	2.30	211	211	1,493	1,493	1,493
02/25/2013	2.19	2.19	2.19	2.19	200	200	1,447	1,447	1,447
02/26/2013	2.32	2.32	2.32	2.32	215	215	1,386	1,386	1,386
02/27/2013	2.19	2.19	2.19	2.19	200	200	1,469	1,469	1,469
02/28/2013	2.19	2.19	2.19	2.19	200	200	1,389	1,389	1,389
03/01/2013	2.10	2.10	2.10	2.10	190	190	1,386	1,386	1,386
03/02/2013	2.32	2.32	2.31	2.31	215	215	1,362	1,362	1,362
03/03/2013	2.39	2.39	2.37	2.37	222	222	1,526	1,526	1,526
03/04/2013	2.45	2.45	2.46	2.46	227	227	1,573	1,573	1,573
03/05/2013	2.61	2.61	2.61	2.61	230	230	1,618	1,618	1,618
03/06/2013	2.51	2.51	2.51	2.51	230	230	1,634	1,634	1,634
03/07/2013	2.63	2.63	2.62	2.62	243	243	1,648	1,648	1,648
03/08/2013	2.51	2.51	2.51	2.51	229	229	1,730	1,730	1,730
03/09/2013	121.33	17.88	109.96	3.77	1,811	1,483	1,670	1,670	57
03/10/2013	456.87	10.75	479.66	2.43	713	566	299	299	2
03/11/2013	5.16	5.06	5.13	2.38	140	140	0	0	0
03/12/2013	1352.31	13.40	1648.90	3.67	775	681	250	250	1
03/13/2013	0.00	4.54	0.00	1.50	281	281	188	188	0
03/14/2013	0.00	7.23	0.00	2.02	392	386	83	83	0
03/15/2013	2.94	2.94	0.00	2.65	264	264	604	604	0
03/16/2013	2.61	2.61	2.62	2.62	234	234	987	987	987
03/17/2013	2.43	2.43	2.41	2.41	218	218	899	899	899
03/18/2013	2.20	2.20	2.17	2.17	210	210	899	899	899
03/19/2013	2.07	2.07	2.05	2.05	200	200	899	899	899
03/20/2013	1.97	1.97	1.99	1.99	192	192	899	899	899
03/21/2013	1.93	1.93	1.92	1.92	184	184	3,212	2,461	2,461
03/22/2013	1.98	1.98	1.98	1.98	177	177	1,048	1,048	1,048
03/23/2013	1.98	1.98	1.98	1.98	181	181	1,086	1,086	1,086
03/24/2013	2.01	2.01	2.01	2.01	185	185	1,091	1,091	1,091
03/25/2013	2.00	2.00	2.00	2.00	184	184	1,118	1,118	1,118
03/26/2013	1.97	1.97	1.97	1.97	181	181	1,119	1,119	1,119
03/27/2013	1.93	1.93	1.92	1.92	176	176	1,110	1,110	1,110
03/28/2013	1.92	1.92	1.93	1.93	176	176	1,086	1,086	1,086
03/29/2013	1.90	1.90	1.90	1.90	175	175	1,084	1,084	1,084
03/30/2013	1.92	1.92	1.91	1.91	178	178	1,080	1,080	1,080
03/31/2013	1.99	1.99	1.98	1.98	184	184	1,097	1,097	1,097

Appendix C

Permit to Operate N-767-9-21

San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: N-767-9-21 **EXPIRATION DATE:** 11/30/2019

EQUIPMENT DESCRIPTION:
SULFURIC ACID PRODUCTION PLANT CONSISTING OF A SULFUR FURNACE, TWO CONVERTERS, SIX WASTE HEAT RECOVERY BOILERS, A DRYING TOWER WITH AN ENTRAINMENT SEPARATOR, AN INTERSTAGE ABSORPTION TOWER WITH A MIST ELIMINATOR, A FINAL TOWER WITH A MIST ELIMINATOR, 15.0 MMBTU/HR ZEECO USA LLC MODEL GB-8 NATURAL GAS-FIRED FURNACE IGNITER BURNER (4919-H-304), AND ASSOCIATED EQUIPMENT.

PERMIT UNIT REQUIREMENTS

1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201 and 4202] Federally Enforceable Through Title V Permit
2. The overall oxides of sulfur emissions as SO2 from the sulfuric acid plant (including fugitive sulfur compound leak emissions) shall not exceed 2.5 pounds per ton of 100% sulfuric acid produced except during periods of start-up and shutdown. [District Rule 2201] Federally Enforceable Through Title V Permit
3. The overall oxides of sulfur emissions as SO2 from the sulfuric acid plant (including fugitive sulfur compound leak emissions) shall not exceed 21.5 pounds per ton of 100% sulfuric acid produced during periods of start-up and shutdown. This performance based limit is to enforce the SOx emission reductions granted by certificates N-74-5 and N-1250-5. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Emissions of oxides of sulfur as SO2 from the entire sulfuric acid plant (including fugitive sulfur compound leak emissions) shall not exceed 1,750 pounds during any one day and 410,296 pounds during any 12-consecutive month period. This performance based limit is to enforce the SOx emission reductions granted by certificates N-75-5 and N-1250-5. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Sulfur compound emissions from the sulfuric acid plant exhaust stack shall not exceed 0.2% by volume, 2000 ppmv, on a dry basis averaged over 15 consecutive minutes. [District Rule 4801 and Rule 407 (San Joaquin)] Federally Enforceable Through Title V Permit
6. The facility shall not discharge into the atmosphere any gases which contain acid mist, expressed as sulfuric acid, in excess of 0.3 pounds per ton of 100% sulfuric acid produced. [District Rules 2201 and 4802] Federally Enforceable Through Title V Permit
7. The oxides of sulfur emissions as SO2 from the sulfuric acid plant shall be determined using the procedures specified in 40 CFR 60.84. [District Rule 2201 and 40 CFR Part 60, Subpart H] Federally Enforceable Through Title V Permit
8. The quantity of sulfuric acid produced shall not exceed 700 tons during any one day. [District Rule 2201]
9. NOx emissions from the sulfur furnace serving the sulfuric acid plant shall not exceed 0.154 lb-NOx per ton of sulfuric acid produced. [District Rule 2201]
10. The Zeeco USA LLC furnace igniter burner shall only be fired on natural gas. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Heat input to the Zeeco USA LLC furnace igniter burner shall not exceed 21,000 MMBtu in any one rolling 12 month period. [District Rule 2201] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

12. The Zeeco USA LLC furnace igniter burner shall be equipped with an operational non-resettable totalizing mass or volumetric fuel flow meter to measure the amount of natural gas combusted in the igniter burner or other District approved alternative. [District Rule 2201] Federally Enforceable Through Title V Permit

13. Emissions from the Zeeco USA LLC furnace igniter burner shall not exceed any of the following limits: 0.061 lb-NOx/MMBtu, 0.00285 lb-SOx/MMBtu, 0.005 lb-PM10/MMBtu, 0.111 lb-CO/MMBtu, or 0.003 lb-VOC/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit

14. A source test for oxides of sulfur shall be conducted on an annual basis. [District Rule 1081] Federally Enforceable Through Title V Permit

15. The results of each test shall be submitted for District evaluation no later than 60 days following each test. [District Rule 1081] Federally Enforceable Through Title V Permit

16. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit

17. Source testing to measure concentrations of oxides of sulfur shall be conducted using either CARB Method 6, CARB Method 8, CARB Method 100, EPA Method 6, or EPA Method 8. [District Rule 1081] Federally Enforceable Through Title V Permit

18. Source testing to measure stack gas flow rate, moisture content, and oxygen content shall be conducted using EPA Methods 1 thru 4. [District Rule 1081] Federally Enforceable Through Title V Permit

19. An hourly log of sulfuric acid produced by each process line shall be kept on the premises at all times and shall be made available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit

20. The permittee shall provide, properly install and maintain in proper working order, continuous monitoring and recording systems to measure oxides of sulfur emissions as SO2. [District Rule 1080, 5.2.1] Federally Enforceable Through Title V Permit

21. The averaging time for the SO2 emission monitoring system shall not exceed 15 minutes. [District Rule 2080] Federally Enforceable Through Title V Permit

22. All continuous monitoring and recording instruments shall be installed, calibrated and operated in accordance with the requirements of 40 CFR 60.84. [District Rule 1080, 6.1.2] Federally Enforceable Through Title V Permit

23. The facility shall install and maintain equipment, facilities, and systems compatible with the District's CEM data polling software system and shall make CEM data available to the District's automated polling system on a daily basis. [District Rule 1080] Federally Enforceable Through Title V Permit

24. Upon notice by the District that the facility's CEM system is not providing polling data, the facility may continue to operate without providing automated data for a maximum of 30 days per calendar year provided the CEM data is sent to the District by a District-approved alternative method. [District Rule 1080] Federally Enforceable Through Title V Permit

25. The permittee shall submit a written report for each calendar quarter to the District no later than 30 days following the end of each calendar quarter. The report shall comply with all of the requirements of the District rules. [District Rule 1080, 8.0] Federally Enforceable Through Title V Permit

26. Source testing to measure sulfuric acid mist using EPA Method 8 of 40 CFR 60 Appendix A shall be conducted on an annual basis. [District Rule 2520, 9.3.2 and District Rule 4201] Federally Enforceable Through Title V Permit

27. A violation of emission standards of this permit, as shown by the stack-monitoring system, shall be reported to the district within 96 hours. [District Rule 1080, 9.0] Federally Enforceable Through Title V Permit

28. The operator shall notify the district at least 24 hours prior to the shutting down of monitoring equipment. In the event of breakdown of monitoring equipment, the owner or the operator shall notify the district within 8 hours after the breakdown is detected. [District Rule 1080, 10.0] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

29. The continuous SO2 monitor shall meet the applicable performance specification requirements in 40 CFR Part 51, Appendix P, and Part 60, Appendix B or shall meet equivalent specifications established by mutual agreement of District, CARB, and the EPA. [District Rule 1080, 6.5] Federally Enforceable Through Title V Permit

30. Visible emissions shall be inspected weekly during operation. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

31. The facility shall visually inspect for sulfur compound leaks at the sulfuric acid plant ducting and equipment each work shift when the plant is operating. Daily records shall be maintained to verify that a leak inspection was performed during each work shift. [District Rule 4102]

32. All sulfur compound leaks at the sulfuric acid plant ducting or equipment shall be reported to the District within 24 hours of detection. All leaks shall be repaired within 24 hours of detection. If the sulfur compound leaks cannot be repaired within 24 hours of detection, the plant shall be shut down until the leaks are repaired. [District Rule 4102]

33. For each sulfur compound leak occurrence, maintain a record indicating the following: (a). Date and time when the sulfur compound leak occurred; (b). Description (i.e. shape, size, type of leak, etc.) and location (relative to the nearest ductwork or equipment) of the sulfur compound leak; (c). Length of time to repair the sulfur compound leak (in minutes or hours); (d). The quantity of sulfur compound emissions from the leak (in pounds per hour); (e). The total quantity of plant sulfur compound emissions (in pounds per day) indicating whether excess emissions occurred due to the leak. [District Rule 4102]

34. The permittee shall maintain a daily record of the quantity of sulfuric acid produced in tons. [District Rules 1070 and 2201]

35. The permittee shall maintain a rolling 12-consecutive month total of the quantity of fuel heat input to the Zeeco USA LLC furnace igniter burner (in MMBtu) and shall update the rolling total at least once each month. The fuel heat input can be calculated by multiplying the amount of natural gas fuel combusted (in scf) by a heating value of 1,000 Btu/scf. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit

36. Permittee shall maintain a rolling 12-consecutive month total of the quantity of oxides of sulfur emissions (as SO2 in pounds) from the entire sulfuric acid plant (including fugitive sulfur compound leak emissions) and shall update the rolling total at least once each month. [District Rules 1070 and 2201]

37. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit

San Joaquin Valley Air Pollution Control District

Application for

[X] EMISSION REDUCTION CREDIT (ERC) [ ] CONSOLIDATION OF ERC CERTIFICATES

1. ERC TO BE ISSUED TO: *J.R. Simplot Company* Facility ID: *N - 767* (if known)

2. MAILING ADDRESS: Street/P.O. Box: *P.O. Box 198*

City: *Lathrop* State: *CA* Zip Code: *95330-0198*

3. LOCATION OF REDUCTION:
Street: *16777 Howland Road*

City: *Lathrop*

1 /4 SECTION *35* TOWNSHIP *1S* RANGE *6E*

4. DATE OF REDUCTION:
Upon completion of the proposed project. Simplot is combining the ERC application with the ATC application for administrative convenience

5. PERMIT NO(S): *N-767-9-12* EXISTING ERC NO(S):

6. METHOD RESULTING IN EMISSION REDUCTION:

[ ] SHUTDOWN [ ] RETROFIT [X] PROCESS CHANGE [ ] OTHER

DESCRIPTION: *Catalyst Replacement in the Sulfuric Acid Plant that will result in improved SO_2 to SO_3 conversion.*

(Use additional sheets if necessary)

7. REQUESTED ERCs: (In pounds per calendar quarter except CO_2e)

	VOC	NOx	CO	PM_{10}	SOx	Other
1st Qtr					*31,500*	
2nd Qtr					*31,500*	
3rd Qtr					*31,500*	
4th Qtr					*31,500*	

CO_2e [ ] metric ton/yr

8. SIGNATURE OF APPLICANT:

TYPE OR PRINT TITLE OF APPLICANT:
CALIFORNIA MANUFACTURING MANAGER

9. TYPE OR PRINT NAME OF APPLICANT:
JOHN YANAK

DATE: 5/28/2013

TELEPHONE NO: *(209) 858-2511*

FOR APCD USE ONLY

RECEIVED
DATE STAMP
MAY 28 2013
SJVAPCD
NORTHERN REGION

FILING FEE RECEIVED: $ 0 /

DATE PAID:

PROJECT NO.: N1131840 FACILITY ID.: N-767

ERC Supplemental Information

The following list identifies the supplemental information provided to support Simplot's ERCapplication.

1. **Equipment Location Drawing or Plot Plan:**

   The requisite drawing is provided in Appendix B.

2. **Equipment Description:**

   A description of the emissions unit being changed as part of this ATC application is found in Section 2.

3. **Description of Actual Emissions Reduction:**

   See Sections 1 and 2 of this ATC application. Simplot is proposing a 12-month rolling total SO_2 emissions limit to make the emissions reductions enforceable. See Section 4 for details.

4. **Baseline Period:**

   The baseline period selected for determining the quantity of ERCs is the two-year period ending March 31, 2013.

5. **Emission of Air Contaminants Before and After the Actual Emissions Reduction:**

   See Section 3 and Appendix C of this application for details on the methods and bases and results of estimated used to determine HAE and post-project PTE of affected pollutants and greenhouse gases.

6. **Process and Instrumentation Flow Diagram:**

   A process flow diagram is provided in Section 2. There is a CEMS in the acid plant stack that is used for monitoring SOx emissions..

7. **Equipment Drawings:**

   Not applicable. There will be no material change to the existing unit. Certain existing equipment will be in-kind, but this will not change the configuration of the Lathrop sulfuric acid plant.

1. Introduction and Overview

1.1 Existing Facility and Process Description

J. R. Simplot Company ("Simplot") operates an existing integrated ammonium phosphate fertilizer manufacturing plant which is located at 16777 Howland Road in Lathrop, San Joaquin County, California (the "Lathrop Plant"). The Lathrop Plant operations include: an ammonium sulfate plant, a fertilizer pellet plant, a sulfuric acid production plant, and associated ancillary equipment.

The principal products produced at the Lathrop Plant include sulfuric acid and various types of ammonium sulfate fertilizer products. Most of the sulfuric acid that is produced is consumed on-site in the production of fertilizer. However, the Lathrop facility also sells a significant amount of sulfuric acid to outside customers. Thus, the fertilizer production operation is not bottlenecked by the sulfuric production operation (i.e., increased production of sulfuric acid will not result in increased production of fertilizer). Production of additional sulfuric acid at the Lathrop plant will increase the amount of sulfuric acid that Simplot has available for sale on the open market or it will be in response to increased demand for the fertilizer produced at the Lathrop facility.

Simplot operates a sulfuric acid plant at the Lathrop Plant with nominal capacity of 700 tons per day that uses a double contact, double absorption process to produce concentrated (98.8%) sulfuric acid ("H_2SO_4"). Simplot is planning to replace the catalysts in the converters of the sulfuric acid plant. Some of these catalysts will be a high-efficiency type.[1] Simplot is also planning to replace or repair certain other equipment within the process. Together these changes are being considered as a single "project" for purposes of this Authority to Construct application. The catalyst replacement project will result in a substantial decrease in both potential and actual

[1] The term "high-efficiency catalyst" is used in this application to describe sulfuric acid plant catalysts that are active at lower temperatures than conventional catalysts. Because chemical equilibrium favors increased oxidation of SO_2 to SO_3 at lower temperatures, such catalysts can allow sulfuric acid plants to operate at higher SO_2-to-SO_3 conversion efficiencies. However, these catalysts are not suitable for use in all of the converter beds in an acid plant. They are typically used only in certain beds in combination with traditional catalysts in other beds to achieve optimum SO_2-to-SO_3 conversion rates.

emissions of sulfur dioxide from the facility. This decrease in emissions is a direct result of improved SO_2-to-SO_3 conversion that will be facilitated by the new catalysts.[2]

The proposed changes to the sulfuric acid plant will "alter" an existing operation that emits air contaminants and will reduce emissions of an air contaminant. In accordance with Rule 2010, Simplot is applying for an "Authority to Construct" ("ATC") to the San Joaquin Valley Air Pollution Control District (the "District") for the proposed project. The project will not increase the potential to emit ("PTE") from the sulfuric acid plant (i.e., no increase in emissions will occur when evaluated on a PTE-to-PTE basis). However, because the project is expected to result in improved functioning and reliability of the existing sulfuric acid plant, Simplot expects that, relative to recent production rates, some increase in the production of sulfuric acid may occur as a result of this project. As described in detail in Chapters 3 and 4 herein, the Project does not constitute a major modification for any regulated NSR pollutant under Major New Source Review or Prevention of Significant Deterioration requirements.

1.2 Project Site

The Lathrop Plant is located in San Joaquin County, California, in an area that is designated as nonattainment for total suspended particulate, particulate matter less than 2.5 microns mean aerodynamic diameter ("PM2.5"), and ozone.[3] A satellite photograph showing the Lathrop Plant site is presented in Figure 1-1. A map of the District, showing the plant location is presented in Figure 1-2. The plant operates under the Permit to Operate Facility: N-767-0-3 which expires on November 30, 2014.

[2] High-efficiency catalysts also require proper temperatures at certain locations within the converter to function effectively.

[3] See 40 CFR § 81.305.

Figure 1-1. Satellite Photograph of the Lathrop Plant Site

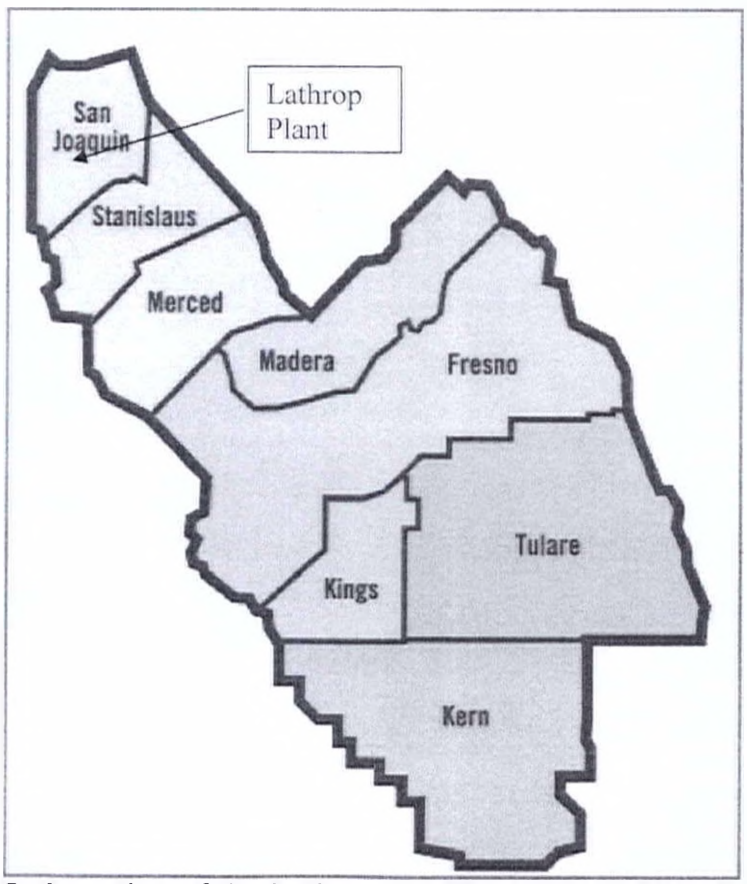


Figure 1-2. Location of the Lathrop Fertilizer Plant within the District

1.3 Project Schedule

Construction of the Lathrop sulfuric acid plant catalyst replacement project is expected to begin in September 2013 with project completion estimated to occur no later than October 31, 2013.

1.4 Application Organization

This ATC application is organized as follows:

- Section 2.0 – Process and Proposed Project Description
- Section 3.0 – Emissions Estimates
- Section 4.0 – Analysis of Applicable Requirements
- Section 5.0 – Proposed Permit Limitations Revisions
- Appendix A – Application Forms
- Appendix B – Plot Plan
- Appendix C – Emissions Calculations Documentation

2. Process and Project Description

2.1 Process Overview

As previously noted, the Lathrop Plant consists of a double-contact, double-absorption ("DCDA") process to produce H_2SO_4 from elemental sulfur. The elemental sulfur is burned in a furnace to produce an SO_2-rich gas stream. The SO_2-rich gas stream is then cooled in a waste heat boiler before being routed to a two-pass, four-bed catalytic converter where it reacts with oxygen to form sulfur trioxide ("SO_3"). After the first converter, the now SO_3-rich gas stream is cooled and sent to an intermediate absorbing tower where much of the SO_3 is absorbed into a concentrated sulfuric acid solution. The exhaust gas from the intermediate absorbing tower is reheated and routed to a second multi-pass four-bed catalytic converter where most of the remaining SO_2 is converted to SO_3. The gas stream exits the second converter, is cooled, and is then routed to the final absorbing tower where virtually all of the remaining gas-phase SO_3 is absorbed into a concentrated sulfuric acid solution.

Within the process, some of the SO_3 that is produced condenses to form fine aerosols (*i.e.*, sulfuric acid mist particles) which are difficult to collect in the absorption steps. To capture this acid mist, the gas exiting the final absorbing tower passes through a set of high-efficiency mist eliminators which collect nearly all (99+%) of this acid mist. In addition to the small amount of uncaptured acid mist, this gas stream contains nitrogen, oxygen, a small amount of unreacted SO_2, and relatively small quantities of filterable particulate matter along with NO_X, and CO_2 produced from the combustion of sulfur in the furnace. The gas is exhausted through an exhaust stack. Much of the energy released through combustion of sulfur and the subsequent oxidation of SO_2 to SO_3 is recovered as steam for use in other areas of the Lathrop Plant. A process flow diagram is presented in Figure 2-1.

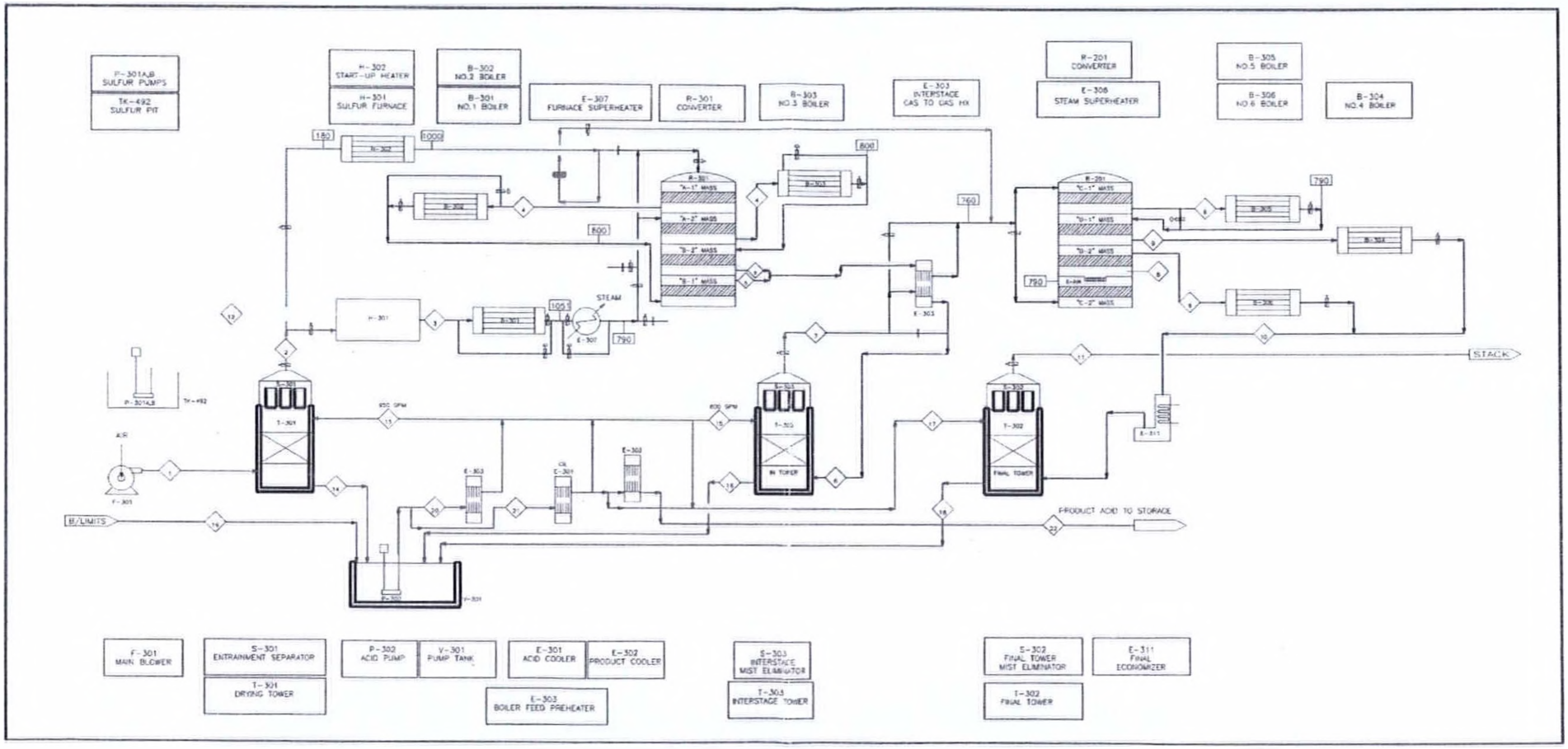


Figure 2-1. Lathrop Sulfuric Acid Plant Process Flow Diagram

2.2 Project Scope

The proposed changes to the Lathrop sulfuric acid plant which are needed to facilitate the targeted reduction in SO_2 emissions include:

- Replace all the catalyst in the existing converters. Where appropriate, high-efficiency catalysts will be installed to improve overall SO_2-to-SO_3 conversion efficiency.[4]
- Replace the existing gas-to-gas heat exchanger. This will be a like-for-like replacement of a worn-out unit, with some minor ducting changes.
- Replace the #2 converter superheater tube bundle. This will be a like-for-like replacement.
- Repair of any identified defects in the converters' shells.

2.3 Unrelated Contemporaneous Repair / Replacement Work

Simplot also intends to make additional repairs and replacements unrelated to the catalyst replacement work. These repairs/replacements include:

- Replace the acid plant stack as the existing stack is reaching the end of its service life due to normal wear-and-tear [2013 turnaround]. The District has determined that this replacement does not require an ATC.
- Replace the acid plant furnace startup burner (*i.e.*, the Sur-Lite Corp. furnace igniter) to address safety issues. The replacement burner will be of similar capacity but will include safety features not present on the existing heater [2013 turnaround].
- Replace the acid plant furnace with a new unit due to normal wear-and-tear [2014 turnaround].
- Replace the main [sulfur furnace] superheater tube bundle due to normal wear-and-tear [2015 turnaround or later].

The additional repair/replacement work listed above is unrelated to the catalyst replacement project. The timing of this work is dictated by the need to address equipment repair and replacement or safety issues independently of the planned change to high-efficiency catalysts. These routine repair projects are noted here because they are in the planning or implementation stages and their costs are conservatively included in evaluating whether the collective changes

[4] Virtually all unconverted SO_2 is emitted from the process. Thus, an increase in conversion efficiency translates into a reduction in SO_2 emissions. Note also that improved conversion of SO_2 to SO_3 results in a slight increase heat recovery and thus, improves the energy efficiency of the plant.

(*i.e.*, the catalyst replacement project plus these additional contemporaneous repairs) constitute a "reconstructed source" as this term is defined in Rule 2201 or "reconstruction" as defined in 40 CFR 60, Subpart A (§ 60.15).

3. Emissions Estimates

The evaluation of regulatory applicability for Simplot's Lathrop sulfuric acid plant catalyst replacement project requires four sets of emissions change estimates. Specifically, estimates are required to determine:

- Whether the project is an SB288 Major Modification;
- Whether the project is a Federal Major Modification;
- Whether the project is a PSD Major Modification; and
- The ERC's that will be generated by the project.

The bases and results of the estimates made for each of the above purposes is documented in this Section of the ATC application.

3.1 SB288 Major Modification

The emissions increase test used to evaluate the project emissions increases for purposes of determining if the project constitutes an SB288 Major Modification is the actual-to-potential test.

The District's guidance on SB288 Major Modification applicability states that the project's emission increase for each pollutant is equal to the sum of the differences between the potential to emit and the baseline emissions (BE) (for existing emission units) or the sum of the potentials to emit (for new emission units).[5] Only existing units are involved in the present project. In computing the emissions for existing emission units, the potential to emit (PE) is the post-project potential to emit for the emission unit. Except for fully offset units, the actual emission are equal to the average emission rate over a two year period preceding the project unless another period is determined by the APCO to be more representative of normal operation. In selecting a more representative two year period, the same criteria as used in determining the baseline period as defined in Rule 2201 shall be used. For purposes of this ATC application, Simplot has elected to use the most recent 2-year period, which includes the quarter ending March 31, 2013, for purposes of determining baseline actual emissions.

[5] See "Implementation of Rule 2201 (as amended on 12/18/08 and effective on 6/10/10) for SB288 Major Modifications and Federal Major Modifications", DRAFT, 9/28/2010. The guidance refers to actual emissions (AE) and baseline actual emissions (BAE). It is Simplot understands that these terms are alternatives to the term baseline emissions (BE) which is defined in Rule 2201, Section 3.8.

Because sulfuric acid manufacturing is one of the source categories specified in 40 CFR 51.165, fugitive emissions are included in the analysis. The District policy is silent in regards to upstream or downstream affected units. For purposes of this analysis, Simplot has included emissions from handling and storage of the acid plant's raw material (elemental sulfur) and product (sulfuric acid) streams. Because the Lathrop plant is a net exporter of sulfuric acid, there are no impacts to the other operations at the facility that would result from the planned changes. Any increase in acid production beyond the baseline production rates would be due to either external or internal demand growth which is unrelated to the present project.

The remainder of this section describes the bases for the actual-to-potential emissions increase analysis and it includes example calculations to facilitate review of the estimates. Additional details and data that provide the underlying bases for the estimates are provided in Appendix C.

3.1.1 Baseline Emissions

The following discussion provides a description of the baseline emissions calculation methodology including example calculations.

3.1.1.1 SO_2 Emissions

Baseline actual emissions of SO_2 from the acid plant stack are calculated from the CEMS (continuous emissions monitoring system) data for the selected baseline period of April 2011 through March 2013. In computing baseline emissions, the actual CEMS emissions data have been adjusted downward to account for applicable emissions limits including:

- SOx <= 4 lb/T[6] (excluding Startup/Shutdown events);
- SOx <= 21.5 lb/T (during Startup/Shutdown events);
- SO_2 <= 2,461 lb/day; and
- SOx <= 2,000 ppmvd (15-minute average).

The CEMS is used to monitor and compute daily SO_2 emissions as well as pound per ton SO_2 emission rates from the acid plant stack.[7] These values are determined based on measured flow

[6] Emission factors discussed in this document that are expressed in units of "lb/T" represent pounds of emissions of a given pollutant per ton of 100% H_2SO_4 produced.

[7] Emissions from the acid plant include SO_2 and H_2SO_4 mist. For purposes of the emissions analysis in this application and per discussion with the District, H2SO4 mist is not considered SOx for purposes of evaluating emissions and regulatory applicability. Thus, the mass rates of SO_2 emissions and SOx emissions from the Lathrop sulfuric acid plant stack are identical.

and concentration values in the sulfuric acid plant stack. Adjustments are made to measured emissions as follows:

- Any day with SO_2 emissions in excess of 2,461 lbs was reduced to 2,461 lbs.
- Any 15-minute average with SO_2 emissions in excess of 21.5 lb/T are reduced to 21.5 lb/T. For any days with data requiring such an adjustment, the ratio of the unadjusted daily average 15-minute average values to the adjusted daily average 15-minute average values is multiplied by the daily unadjusted SO_2 mass emissions rate to compute an adjusted daily SO_2 mass emissions rate.
- Any 3-hour average with SO_2 emissions in excess of 4 lb/T are reduced to 4 lb/T. For any days with data requiring such an adjustment, the ratio of the unadjusted daily average 3-hour average values to the adjusted daily average 3-hour average values is multiplied by the daily unadjusted SO_2 mass emissions rate to compute an adjusted daily SO_2 mass emissions rate.
- Any 15-minute average with SO_2 emissions in excess of 2,000 ppmv are reduced to 2,000 ppmv. For any days with data requiring such an adjustment, the ratio of the unadjusted daily average 15-minute average values to the adjusted daily average 15-minute average values is multiplied by the daily unadjusted SO_2 mass emissions rate to compute an adjusted daily SO_2 mass emissions rate.
- On days where multiple adjustments result from the above logic, the adjustment that results in the lowest daily SO_2 emissions rate is used.

For the selected two-year baseline period, the adjusted SO_2 emissions from the acid plant stack averaged 536,317 lb/year.

Baseline emissions of fugitive SO_2 from storage, handling, and loadout of the product acid are estimated based on an engineering calculation (see Attachment C-1), the baseline actual acid production rate of 174,932 tons per year, and baseline actual operating hours of 7,896 hours per year. These non-stack emissions are estimated to total 161 lb/yr.[8] A negligible amount of SOx is produced by the startup burner and any such emissions should be accounted for in the CEMS data.

3.1.1.2 NOx Emissions

Actual NOx emissions from the acid plant stack are calculated from two sources of information. The first is the monthly sulfuric acid production records for the Lathrop sulfuric acid plant during the baseline period. The second is a baseline actual NOx emissions factor.

[8] See Appendix C for details.

In the case of NOx, Simplot derived the baseline actual emissions factor from source tests that have been conducted at its sulfuric acid plants in Idaho and Wyoming. The average NOx emissions factor derived from 40 different stack tests at these plants equals 0.081 lb/T. This factor is used as the basis for the baseline NOx emissions estimates for sulfur combustion in the Lathrop sulfuric acid plant.

An example calculation for NOx emissions from the acid plant is provided below. Summaries of the stack test data and production data used as the bases for these estimates are provided in the spreadsheet printouts in Appendix C. Below is an example calculation for NOx emissions from sulfur combustion in the acid plant:

Input Data:

Baseline Acid Plant Production (as 100% H_2SO_4)	=	174,932 T/yr
BE NOx Emissions Factor	=	0.081 lb/T

Example Calculation:

NOx BE = (174,932 T/yr) x (0.081 lb/T)	=	14,170 lb/yr

In addition to NOx emissions from sulfur combustion, there is a small amount of NOx emitted from the sulfur furnace startup burner. BE of NOx from this burner are estimated using the permit limit of 62 lb NOx/MMSCF[9] and the measured natural gas consumption rate of this burner during the baseline period. Below is an example calculation:

Input Data:

Baseline Actual Gas Firing Rate	=	1.82 MMSCF/yr
NOx Emissions Factor	=	62 lb/MMSCF

Example Calculation:

NOx BE = (1.82 MMSCF/yr) x (62 lb/MMSCF)	=	113 lb/yr

[9] The permit limit is 0.061 lb/MMBtu. This value represents the permit limit expressed as lb/MMSCF based on the AP-42 HHV for natural gas of 1,020 Btu/SCF.

3.1.1.3 PM10 Emissions

Pursuant to Rule 2201(3.8), the BE for a Clean Emissions Unit is the pre-Project PTE. A Clean Emission Unit for a particular pollutant is defined in Rule 2201(3.13) as a unit that is equipped with an emission control technology with a minimum control efficiency of at least 95%. The Lathrop sulfuric acid plant is equipped with high efficiency candle-type mist eliminators that control sulfuric acid mist emissions (which are also PM10 emissions) with greater than 99% control efficiency. As such, this unit qualifies as a Clean Emission Unit under Rule 2201(3.13).[10] Thus, in accordance with Rule 2201(3.8), the PM10 BE equals pre-project PTE for this unit.

In the case of PM10 emissions, the baseline emissions equal the estimated pre-project potential to emit. The pre-project PM10 PTE is derived from the H_2SO_4 permit limit of 0.3 lb/T and the assumption that PM10 emissions equal 110% of acid mist emissions. This assumption is consistent with 100% of the acid mist being considered condensable particulate matter (*i.e.*, all acid mist is PM10 and PM2.5) and the expectation that a small amount of filterable particulate matter will also be emitted from the acid plant stack.[11] Thus, PM10 BE are calculated as follows:

Input Data:

Potential PM10 Emissions Factor	=	0.33 lb/T
Potential 100% H_2SO_4 Production	=	255,000 T/yr[12]

[10] The minimum estimated control efficiency for PM10 assuming that the mist eliminators control no filterable PM10 is estimated as follows:

- Uncontrolled Acid Mist = 30 lb/T (at 99% efficiency and an acid mist PTE of 0.3 lb/T)
- Uncontrolled Filterable PM10 = 0.03 lb/T (10% of controlled acid mist emissions)
- Uncontrolled PM10 Emissions = Uncontrolled Acid Mist + Uncontrolled Filterable PM10 = 30.03 lb/T
- Mist Eliminator PM10 Control Efficiency = [1 – (0.33/30.03)] = 98.9% efficient.

[11] This 10% filterable estimate is based on stack test data from other Simplot acid plants and application of engineering judgment to those data.

[12] This value is the design production rate for the Lathrop sulfuric acid plant which is 700 T/day and an assumed potential to operate 365 days per year.

Example Calculation:

PM10 BE = (255,500 T/yr) x (0.33 lb PM10/T) = 84,315 lb/yr

In addition to PM10 emissions from normal operation of the acid plant, there is a small amount of PM10 emitted from the sulfur furnace startup burner. The BE of PM10 from this burner are estimated using the permit limit of 5.1 lb/MMSCF[13] and the natural gas consumption rate of this burner during the baseline period. PM10 emissions are calculated using the same equations as the example startup burner NOx emissions calculations above.

BE of PM10 (H_2SO_4) from storage, handling, and loadout of product acid are estimated based on an engineering calculation and the baseline actual acid production rate of 174,932 T/yr. These non-stack emissions total 228 lb/yr.[14]

Note that no adjustments to BE are required for NOx or PM10.

3.1.1.4 VOC Emissions

As a general matter, sulfuric acid plants are not known to emit any VOC since there are no organic compounds used or produced in the process. A trace amount of VOC are emitted from combustion of natural gas in the startup burner. These emissions average less than 0.5 lb/day. Therefore, VOC BE from the sulfuric acid plant are assumed to be zero.

3.1.1.5 Baseline Emissions Summary

Table 3-1 summarizes the estimated baseline emissions computed using this approach.

Table 3-1. Baseline Emissions from the Lathrop Sulfuric Acid Plant

Pollutant	Actual Emissions (lb/year)
VOC	0
NOx	14,282
PM10	84,553
SOx	536,317

[13] The permit limit is 0.005 lb/MMBtu. This value represents the permit limit expressed as lb/MMSCF based on the AP-42 HHV for natural gas of 1,020 Btu/SCF.

[14] See Appendix C for details.

3.1.2 Post-Project Potential Emissions

The following discussion provides a description of the post-project potential emissions (PE) calculation methodology including example calculations.

3.1.2.1 SO_2 Emissions

The post-project potential SO_2 emissions from the acid plant stack are based on a proposed 12-month total emissions limit of 410,059 lbs SO_2/year.[15]

Potential emissions of fugitive SO_2 emissions from storage, handling, and loadout of the product acid are estimated based on an engineering calculation, a potential acid production rate of 255,500 tons per year. These non-stack emissions are estimated to total 235 lb/yr.[16]

3.1.2.2 NOx Emissions

Potential emissions for each of these pollutants from the acid plant stack are calculated using a potential sulfuric acid production rate of 255,500 tons per year and pollutant-specific post-project potential emissions factors. In the case of NOx, the post-project emissions factor is estimated to equal the 99th percentile value derived from the 40 stack tests at Simplot's Idaho and Wyoming sulfuric acid plants. This is a value of 0.154 lb/T and is applied as a worst-case potential NOx emission factor for the Lathrop sulfuric acid plant. Below is an example calculation for NOx:

Input Data:

Potential Production (100% H_2SO_4)	=	255,500 T/yr
NOx EF (99th% value from test data)	=	0.154 lb/T

Example Calculation:

NOx PE = (255,500 T/yr) x (0.154 lb NOx/T)	=	39,365 lb/yr

Potential emissions of NOx from the sulfur furnace startup burner are estimated using the allowable natural gas firing rate of 21,000 MMBtu/year and the NOx permit limit of 62 lb/MMSCF. See the discussion and example calculation in Section 3.1.1.2 for additional details.

[15] Includes potential SO_2 emissions from natural gas combustion in the startup burner.

[16] See Appendix C for details on how these emissions are estimated.

3.1.2.3 PM10 Emissions

The same calculation is used to estimate potential PM10 emissions from the acid plant stack as is used to estimate BE emissions. See Section 3.1.1.3 for details.

Potential emissions of PM10 from the sulfur furnace startup burner are estimated using the allowable natural gas firing rate of 21,000 MMBtu/year and the PM10 permit limit of 5.1 lb/MMSCF. See the example calculation for NOx emissions from this burner in Section 3.1.1.2 for additional details.

Potential emissions of PM10 from storage, handling, and loadout of product acid are estimated based on an engineering calculation and the potential actual acid production rate of 255,500 T/yr. These non-stack emissions total 334 lb/yr.[17]

3.1.2.4 VOC Emissions

As a general matter, sulfuric acid plants are not known to emit any VOC since there are no organic compounds used or produced in the process. A trace amount of VOC are emitted from combustion of natural gas in the startup burner. The VOC PTE average less than 0.5 lb/day. Therefore, VOC PE from the sulfuric acid plant is assumed to be zero.

3.1.2.5 Post-Project Potential Emissions Summary

Table 3-2 summarizes the estimated PE computed using this approach.

Table 3-2. Post-Project PE of the Lathrop Sulfuric Acid Plant

Pollutant	Post-Project PE (lb/year)
VOC	0
NOx	40,649
PM10	84,756
SOx	410,296

[17] See Appendix C for details.

3.1.3 Actual-to-Potential Change

Table 3-3 summarizes the project emissions increases on an actual-to-potential basis and compares the project increases to the SB288 Major Modification Thresholds. As shown in Table 3-3, the project does not constitute an SB288 Major Modification.

Table 3-3. Project Emissions Change on an Actual-to-Potential Basis

Pollutant	SB288 Major Modification Threshold (lb/yr)	Baseline Emissions [BE] (lb/yr)	Potential Emissions [PE] (lb/yr)	Project Δ [PE – BE] (lb/yr)	SB288 Major Modification?
VOC	50,000	0	0	0	No
NOx	50,000	14,282	40,649	26,367	No
PM_{10}	30,000	84,553	84,756	204	No
SOx	80,000	536,317	410,296	-126,021	No

3.2 Federal Major Modification

The emissions increase test used to evaluate the project emissions increases for purposes of determining if the project constitutes a Federal Major Modification is the actual-to-projected actual (ATPA) test. In making the assessment of the project emissions increase, calculated emission increases from new or modified emission units that are less than or equal to 0.5 lb/day are rounded to zero. This calculation is performed on an emission unit by emission unit basis. New or modified emission units with emission increases that round to zero do not constitute a Federal Major Modification.

The District's guidance on Federal Major Modification applicability states that the first step is to determine if the project itself results in a significant emission increase. In this determination, only emission increases are counted. Emission decreases associated with the project are not counted. This part of the guidance is potentially relevant in this case because the primary purpose of the project is to reduce SO_2 emissions from the acid plant stack and thereby generate emission reduction credits (ERCs). However, because there is only one emissions unit being modified and because emissions increases of SOx from other affected units are less than significant, the requirement to count only increases has no effect on the outcome of the applicability determination.

According to District guidance, for existing emission units, the project's emission increase for each pollutant is equal to the sum of the differences between the projected actual emissions

(PAE) and the baseline actual emissions (BAE).[18] Where there is no increase in design capacity or potential to emit, the PAE are equal to the maximum annual emission rate at which the unit is projected to emit in any one year selected by the operator within 5 years after the unit resumes normal operation (10 years for existing units with an increase in design capacity or potential to emit).

District policy requires that Simplot estimate the projected actual emissions based on all information relevant to the emission unit(s) including expected business activity, and provide a detailed justification of the estimate in the ATC application. If a justified estimate is not provided, the potential to emit for the existing emission units must be used for this calculation. For projects without an increase in design capacity or potential to emit, the PAE cannot exceed the pre-project potential to emit. The discussion provided later in this section along with the data in Appendix C provide the required justification for Simplot's estimates of projected actual emissions.

For existing emission units (other than electric utility steam generating units), the BAE are calculated based on any 24 month period selected by the operator within the previous 10 year period. BAE must be adjusted downward to exclude any non-compliant operation emissions and emissions no longer allowed due to lower applicable emission limits that apply at the time of application. The evaluation of BAE must document any such adjustments or state that no such adjustments are required. In this case, a single baseline period (April 1, 2011 through March 31, 2013) has been selected for all pollutants. Downward adjustments have been made to SOx emissions to reflect the current operating permit limits. The specific downward adjustments are described in general terms herein (see Section 3.1.1) and the data provided in Appendix C document both unadjusted and adjusted baseline SO_2 emissions. No adjustments are required for any other pollutants considered in this evaluation.

In calculating the project emission increase (*i.e.*, PAE – BAE) the portion of the emissions after the project that the unit could have accommodated before the project (during the same period used to determine BAE) and that are unrelated to the particular project (including emissions increases due to product demand growth) are to be excluded. In other words, the difference in emissions between what the unit could have actually accommodated (legally and physically) before the project and the BAE are to be subtracted from any calculated increase, if the ability to

[18] See "Implementation of Rule 2201 (as amended on 12/18/08 and effective on 6/10/10) for SB288 Major Modifications and Federal Major Modifications", DRAFT, 9/28/2010.

utilize the previously unused capacity is not related to the current project. This quantity is termed "unused baseline capacity emissions" or UBCE.

To determine the unused baseline capacity emissions, the facility must provide a description of all legal and physical limitations on the emission unit's utilization rate prior to the project. Such legal and physical limitations are not limited to requirements of the District permit. A specific discussion of the UBCE emissions estimates and the bases for these estimates are provided later in this section.

The remainder of this section describes the bases for the actual-to-projected actual (ATPA) emissions increase analysis and it includes example calculations to facilitate review of the estimates. Again, additional details and the data that provide the underlying bases for the estimates are provided in Appendix C.

3.2.1 Baseline Actual Emissions

Simplot selected the same baseline period purposes of determining whether a Federal Major Modification will occur as is used for determining if an SB288 Major Modification would occur. Thus, the baseline emissions (*i.e.*, BE and BAE) for both applicability tests are identical for certain pollutants.

3.2.1.1 SO_2, NOx, and VOC

The BE and BAE for SO_2, NOx, and VOC are identical. See the discussion in Section 3.1.1 for details on how these emissions are determined.

3.2.1.2 PM10 Emissions

The BAE PM10 emissions from the Lathrop Sulfuric Acid Plant are estimated in a manner analogous to the BE PM10 emissions (Section 3.1.1.3). However, a different emissions factor and a different production rate are used. The BAE PM10 emissions factor is derived from the actual production-weighted average H_2SO_4 emissions factor during the baseline period of 0.129 lb/T and the assumption that PM10 emissions equal 110% of H_2SO_4 emissions. The resultant PM10 emissions factor is 0.142 lb/T.[19] This factor is applied to the baseline actual sulfuric acid production rate of 174,932 T/yr (100% H_2SO_4) to estimate BAE of PM10 as follows:

[19] The production-weighted average factor applies the 2011 stack test result to the 2011 production values and the 2012 stack test result to the 2012-2013 production data.

Input Data:

Baseline Acid Plant Production (as 100% H_2SO_4) = 174,932 T/yr

BAE PM10 Emissions Factor = 0.142 lb/T

Example Calculation:

PM10 BAE = (174,932 T/yr) x (0.142 lb/T) = 24,840 lb/yr

In addition to PM10 emissions from normal operation of the acid plant, there is a small amount of PM10 emitted from the sulfur furnace startup burner. The BAE of PM10 from this burner are estimated using the permit limit of 5.1 lb/MMSCF[20] and the natural gas consumption rate of this burner during the baseline period. PM10 emissions are calculated using the same equations as the example startup burner NOx emissions calculations in Section 3.1.1.2.

BAE of PM10 (H_2SO_4) from storage, handling, and loadout of product acid are estimated based on an engineering calculation and the baseline actual acid production rate of 174,932 T/yr. These non-stack emissions total 228 lb/yr.[21]

3.2.1.3 Baseline Actual Emissions Summary

Table 3-4 summarizes the estimated baseline emissions computed using this approach.

Table 3-4. Baseline Actual Emissions from the Lathrop Sulfuric Acid Plant

Pollutant	BAE (lb/year)
VOC	0
NOx	14,282
PM10	25,078
SOx	536,317

3.2.2 Projected Actual Emissions

The following discussion provides a description of the projected actual emissions calculation methodology including example calculations.

[20] The permit limit is 0.005 lb/MMBtu. This value represents the permit limit expressed as lb/MMSCF based on the AP-42 HHV for natural gas of 1,020 Btu/SCF.

[21] See Appendix C for details.

3.2.2.1 SO_2, NOx and PM10

PAE for each of these pollutants from the acid plant stack are calculated using a projected actual sulfuric acid production rate of 235,000 tons per year[22] combined with specific estimates of post-project emissions factors. Note that while the projections are based on a specific production rate, only the post-project emissions estimates (and not the post-project production rate) are considered in determining reporting obligations pursuant to 40 CFR 51.165(a) (6).

The SO_2 emissions factor used to determine the SO_2 PAE from the acid plant stack is 1.7 lb/T. This is Simplot's estimate of the average post-project SO_2 emissions rate that is expected to be achievable following the catalyst replacement and other replacements that will aid in minimizing SO_2 emissions.

Below is an example calculation showing how the SO_2 PAE are estimated:

Input Data:

Projected Actual Production (100% H_2SO_4)	=	235,000 T/yr
Projected SO_2 EF (lb/T)	=	1.7 lb/T

Example Calculation:

SO_2 PAE = (235,000 T/yr) x (1.7 lb SO_2/T)	=	399,500 lb/yr

PAE emissions of SO_2 from storage, handling, and loadout of the product acid are estimated based on an engineering calculation and the projected acid production rate of 235,000 T/yr. These non-stack emissions total 216 lb/yr. As projected actual emissions from the sulfur furnace startup burner contributes a negligible amount of emissions to the total SO_2 emissions from this source.

In the case of NOx, the projected actual emissions factor for the acid plant is estimated to equal the upper 95% confidence interval of the mean derived from 40 stack tests at Simplot's Idaho and Wyoming sulfuric acid plants. This is a value of 0.091 lb/T and it represents an upper limit for expected NOx emissions from the Lathrop sulfuric acid plant over the next five years. The

[22] This value is based on an average daily production rate of 700 tons and an estimated 336 days per year of operation, which assumes the acid plant could operate at its daily production capacity except for 3 weeks per year allocated for maintenance downtime and a total of 8 days per year allocated to unscheduled but anticipated downtime.

same calculation approach used for determining the SO_2 PAE is used for determining the NOx PAE from the acid plant.

NOx emissions from the startup burner are estimated using the same approach and emissions factors as described in Section 3.1.1.2. The projected actual natural gas rate used to estimate these emissions is equal to the maximum actual rate experienced in the last 10 years.

In the case of PM10 PAE emissions from the stack, the projected actual emissions factor is estimated based on H_2SO_4 emissions in a manner similar to how the BE emissions are estimated. The PAE H_2SO_4 emissions factor is estimated to equal the maximum value derived from the Lathrop acid plant stack tests from 2004 through 2012. This is a value of 0.154 lb/T and it represents an upper limit for expected H_2SO_4 emissions from the Lathrop sulfuric acid plant over the next five years. Applying the 10% factor that is used to estimate filterable particulate emissions in other estimates, the projected actual H_2SO_4 emissions factor translates to a projected PM10 emissions factor of 0.17 lb/T. The same calculation approach used for determining the SO_2 PAE from the acid plant stack is used for determining the PM10 PAE from the stack.

The PAE of H_2SO_4/PM10 from storage, handling, and loadout of product acid are estimated based on an engineering calculation and the projected actual acid production rate of 235,000 T/yr. These non-stack emissions total 0.9 lb/day.[23]

3.2.2.2 VOC Emissions

As a general matter, sulfuric acid plants are not known to emit any VOC since there are no organic compounds used or produced in the process. A trace amount of VOC are emitted from combustion of natural gas in the startup burner. These emissions are projected to average less than 0.5 lb/day. Therefore, VOC PAE from the sulfuric acid plant are assumed to be zero.

3.2.2.3 Projected Actual Emissions Summary

Table 3-5 summarizes the PAE computed using the above described approach.

[23] See Appendix C for details of how this estimate is derived.

Table 3-5. PAE of the Lathrop Sulfuric Acid Plant

Pollutant	Post-Project PAE (lb/year)
VOC	0
NOx	21,540
PM10	40,269
SOx	399,723

3.2.3 Unused Baseline Capacity Emissions

The following discussion provides a description of the calculation methodology used to estimate unused baseline capacity emissions including example calculations. These estimates are all based on the underlying estimate that the various equipment repair and replacement activities that Simplot is planning will result in a reduction in unscheduled downtime of as much as 0.6%, which equates to a project-related increase in projected annual sulfuric acid production of 1,211 T/yr. The projected decrease in unscheduled downtime compares to a total unscheduled downtime of about 2.9% during the baseline period, and thus, it represents about a 20% reduction in unscheduled downtime estimated to result from the project. Note also that the project is not specifically being implemented to reduce downtime. Instead, Simplot anticipates that some of the repairs and replacements that are planned will have the consequence of reducing or eliminating some downtime. A 20% reduction in unplanned downtime attributable to the planned replacements is thus believed to be conservative.

3.2.3.1 SO_2 Emissions

Because the project will result in a reduction of the SO_2 emissions capability of the Lathrop sulfuric acid plant relative to the baseline emissions, there are no UBCE of SO_2 from the sulfuric acid plant stack (i.e., the post-project emission rates of SO_2 from the acid plant are not "unrelated to the project"). Since the UBCE emissions of SO_2 from other operations (*e.g.*, storage, handling, and loadout of product acid) are negligible, the SO_2 UBCE are zero.

3.2.3.2 NOx and PM10 Emissions

UBCE from the sulfuric acid plant stack for these pollutants are calculated using a baseline sulfuric acid production capability of 233,789 tons per year.[24] The same emission factors used

[24] This value represents Simplot estimate of the production capacity of the sulfuric acid plant during the selected baseline period that is unrelated to the project. This estimate is based on an average daily production rate of 700 tons and an estimated 336 days per year of operation adjusted for the estimated project-related unscheduled

for the PAE estimates are used to estimate UBCE from the acid plant stack. It is appropriate to use the same emissions factors because they are representative of the emissions capability of the Lathrop acid plant during the baseline period and because the planned project is not expected to affect emissions factors for any pollutants except SO_2.

To calculate UBCE from the acid plant stack, the baseline production capability of the acid plant is multiplied by an emissions factor representative of the baseline capability of the unit. BAE are subtracted from this total to yield a value that represents the "gap" between the baseline emissions capacity of the unit and the actual baseline emissions (*i.e.*, the unused baseline capacity emissions).

In the case of NOx, the UBCE from sulfur burning in the acid plant are estimated using the projected actual NOx emissions factor of 0.091 lb/T. Below is an example calculation showing how the NOx UBCE are determined:

Input Data:

Baseline Production Capacity (100% H_2SO_4)	=	233,789 T/yr
NOx EF	=	0.091 lb/T
NOx BAE	=	14,170 lb/yr

Example Calculation:

NOx UBCE = (233,789 T/yr) x (0.091 lb NOx/T) – (14,170 lb/yr) = 7,105 lb/yr

The UBCE NOx emissions from the startup burner are estimated using the same AP-42 NOx emissions factor and a baseline capacity natural gas consumption rate equal to the maximum rate experienced in the last 10 years. Below is an example calculation:

downtime reduction of 0.6% (*i.e.*, [700 T/d] x [336 days/yr] x [1-0.006] = 233,789 T/yr). Actual production levels during the baseline were lower than this value due to lack of demand for product acid.

Input Data:

Startup Burner Baseline Capacity Gas Firing Rate	=	2.5 MMSCF/yr
NOx Emissions Factor	=	62 lb/MMSCF
NOx BAE	=	113 lb/yr

Example Calculation:

NOx UBCE = (2.5 MMSCF/yr) x (62 lb/MMSCF) – (113 lb/yr) = 42 lb/yr

Total NOx UBCE from the Lathrop sulfuric acid plant equal the sum of the NOx UBCE from sulfur combustion and the NOx UBCE from natural gas combustion, or 7,147 lb/yr.

The PM10 UBCE from the acid plant stack are estimated using the same emissions factor that is used to projected actual particulate emissions (*i.e.*, 0.17 lb/T). The same calculation approaches used for determining the NOx UBCE from the acid plant stack and sulfur furnace startup burner are used for determining the PM10 UBCE from these sources.

UBCE emissions of PM10 from storage, handling, and loadout of product acid are estimated based on an engineering calculation and the baseline acid production capacity of 233,789 T/yr. These non-stack emissions amount to a total of 77 lb/yr.

3.2.3.3 VOC Emissions

As a general matter, sulfuric acid plants are not known to emit any VOC since there are no organic compounds used or produced in the process. A trace amount of VOC are emitted from combustion of natural gas in the startup burner. These emissions average less than 0.5 lb/day. Therefore, the VOC UBCE from the sulfuric acid plant are assumed to be zero.

3.2.3.4 UBCE Emissions Summary

Table 3-6 summarizes the UBCE computed using the above described approach.

Table 3-6. UBCE of the Lathrop Sulfuric Acid Plant

Pollutant	UBCE (lb/year)
VOC	0
NOx	7,147
PM10	14,984
SOx	0

3.2.4 Actual-to-Projected Actual Change

Table 3-7 summarizes the project's emissions increase on an actual-to-projected actual basis and compares that increase to the Federal Major Modification Thresholds. As shown in this table, the project does not constitute a Federal Major Modification.

Table 3-7. Project Emissions Change on an Actual-to-Projected Actual Basis

Pollutant	Federal Major Modification Threshold (lb/yr)	BAE (lb/yr)	UBCE (lb/yr)	PAE (lb/yr)	Project Δ [PAE-UBCE-BAE] (lb/yr)	Federal Major Modification?
VOC	0	0	0	0	0	No[a]
NOx	0	14,282	7,147	21,540	0	No[a]
PM2.5 Direct	20,000	25,078	14,984	40,269	207	No
PM2.5 (NOx)	80,000	14,282	7,147	21,540	0	No[a]
PM2.5 (SO_2)	80,000	536,317	56	399,723	-136,650	No
PM10	30,000	25,078	14,984	40,269	207	No
SOx	80,000	536,317	0	399,723	-136,594	No

a. These increases average less than 0.5 lb/day and therefore, in accordance with District policy, are shown as zero for purposes of determining if the emissions increases constitute a Federal Major Modification.

3.3 PSD Major Modification

The emissions increase test used to evaluate the project's emissions increases for purposes of determining if the project constitutes a PSD Major Modification is the actual-to-projected actual (ATPA) test. The general methodologies and principles used in using this applicability test are described in detail in Section 3.2.

3.3.1 Baseline Actual Emissions

Simplot selected the same baseline period purposes of determining whether a PSD Major Modification will occur as is used for determining if an SB288 or a Federal Major Modification would occur.

3.3.1.1 SO_2, NOx and PM10 Emissions

For SO_2, NOx, H_2SO_4 and PM10, the baseline actual emissions for determining PSD applicability are identical to the baseline actual emissions computed for purposes of determining if an SB288 or Federal Major Modification will result from the project. See the discussion in Section 3.1.1 for details. Due to the nature of emissions from the process, all filterable PM emissions are assumed to be PM10. This assumption is consistent with the properties of the sulfuric acid plant mist eliminators which have efficiencies of approaching 100% for particles larger than 2.5 microns.

Additional pollutants evaluated in determining PSD applicability include greenhouse gases (GHGs), CO, filterable particulate matter, H_2S, TRS (total reduced sulfur), and RSC (reduced sulfur compounds). The methodologies used to estimate the BAE of these additional pollutants are described below.

3.3.1.2 Greenhouse Gas (GHG) Emissions

Greenhouse gas emissions result from operation of the sulfur furnace startup burner. In addition, there may be a small amount of GHG emissions produced from combustion of elemental sulfur. GHG emissions data from sulfur combustion are reported in U.S. EPA's background report for Chapter 8, Section 10 of AP-42. In reviewing the available data on sulfuric acid plant GHG emissions, it is unclear if the data represent real GHG emissions or they represent measurement error. Nevertheless, as a conservative estimate of GHG emissions from sulfur combustion, Simplot computed a GHG emissions factor of 0.268 lb CO_2e/T from the data in the AP-42 background report and used this factor to assess GHG emissions (as CO_2e) from sulfur combustion at the Lathrop sulfuric acid plant.[25] Below is an example calculation:

Input Data:

Baseline Actual Production (100% H_2SO_4)	=	174,932 T/yr
CO_2e Emissions Factor	=	0.268 lb/T

Example Calculation:

CO_2e BAE =(174,932 T/yr) x (0.268 lb/T) x (1 T/2000 lb) = 23.5 T/yr

[25] Values derived from data in *"Background Report, AP-42 Section 5.17, Sulfuric Acid,"* Pacific Environmental Services, Inc., December 3, 1992. The emissions factor used by Simplot in this analysis is the upper 95% confidence interval of the mean of reported values rated "A" or "B" from tests of sulfur burning plants.

BAE GHG emissions from the startup burner are estimated using the GHG emissions factors for natural gas combustion found at 40 CFR 98, Tables C-1 and C-2 and the natural gas consumption rate during the baseline period.[26] Below is an example calculation for CO_2e emissions produced by natural gas combustion:

Input Data:

Baseline Actual Gas Firing Rate	=	1.82 MMSCF/yr
CO_2e Emissions Factor	=	119,344 lb/MMSCF

Example Calculation:

CO_2e BAE = (1.82 MMSCF/yr) x (119,344 lb/MMSCF) x (1 T/2000 lb) = 109 T/yr

The total CO_2e BAE from the Lathrop sulfuric acid plant equals the sum of the CO_2e BAE from sulfur combustion and the CO_2e BAE from natural gas combustion, or 132 T/yr.

3.3.1.3 Sulfuric Acid Mist (SAM or H_2SO_4) Emissions

The BAE of H_2SO_4 are estimated using the actual production-weighted average H_2SO_4 emissions factor during the baseline period of 0.129 lb/T and the baseline actual production rate of 174,932 T/yr. The same calculation methodology used to estimate the CO_2e BAE from the acid plant in Section 3.3.1.2 is used to estimate the BAE of SAM.

3.3.1.4 CO Emissions

CO emissions result from operation of the sulfur furnace startup burner. The BAE of CO are estimated using the permit limit of 36 lb/MMSCF and the actual natural gas consumption rate by this burner as measured during the baseline period. The same calculation approach is used to estimate these emissions as is used to estimate CO_2e emissions from the startup burner.

[26] A natural gas heating value of 1,020 MMBtu/SCF is assumed in converting the factors in 40 CFR 98 from units of lb/MMBtu to lb/MMSCF. Additionally, the mass emissions factors for N_2O and CH_4 are multiplied by 310 and 21 respectively to account for the global warming potential of these compounds.

3.3.1.5 Filterable PM Emissions

Filterable PM BAE from the acid plant are estimated as 10% of the PM10 BAE during routine operation of the acid plant. This 10% factor is based on engineering judgment and review of test data from other Simplot acid plants.

Filterable PM BAE from the startup burner are estimated using the AP-42 natural gas external combustion emissions factor of 1.9 lb/MMSCF and the measured natural gas consumption rate during the baseline period. The same calculation approach is used to estimate these emissions as is used to estimate CO_2e emissions from the startup burner.

3.3.1.6 H_2S/TRS/RSC Emissions

Emissions of H_2S may result from storage, handling, and receiving of elemental sulfur. H_2S is also considered TRS and RSC. H_2S is slightly soluble in elemental sulfur and since elemental sulfur is often produced in petroleum refineries using the Claus process, which reacts H_2S with SO_2 to form elemental sulfur. Thus, it is possible that the elemental sulfur delivered to the Lathrop plant will contain some dissolved H_2S. Unloading, storage, and handling of the elemental sulfur can therefore be expected to liberate some H_2S, assuming that there is dissolved H_2S present in the first place.

The BAE H_2S/TRS/RSC emissions from elemental sulfur storage, handling, and unloading operations are estimated using an engineering calculation which assumes that any H_2S dissolved in the elemental sulfur would be liberated from the sulfur raw material before the sulfur is combusted in the furnace. This assumption is highly conservative, but it provides a worst-case estimate of the project emissions increase for purposes of evaluating PSD applicability. An example calculation is provided below:

Input Data:

Baseline Actual Production (100% H_2SO_4)	=	174,932 T/yr
H_2SO_4-to-Sulfur Ratio	=	3 (T H_2SO_4/T S)
Dissolved H_2S Concentration[27]	=	1 ppmw

[27] See Appendix C for the derivation of the dissolved H_2S concentration value.

Example Calculation:

H_2S BAE = (174,932 T/yr) x (1 T S/3 T H_2SO_4) x (1 T $H_2S/10^6$ T S) = 0.06 T/yr

3.3.1.7 Baseline Actual Emissions Summary

Table 3-8 summarizes the estimated baseline actual emissions computed using the methods described above.

Table 3-8. Baseline Actual Emissions from the Lathrop Sulfuric Acid Plant

Pollutant	BAE (T/yr)
CO	0.03
NO_x	7.1
SO_2	268
PM	1.1
PM_{10}	12.5
H_2SO_4 Mist	11.4
H_2S/TRS/RSC	0.06
GHGs (CO_2e)	132

3.3.2 Projected Actual Emissions

The following discussion provides a description of the projected actual emissions calculation methodology including example calculations.

3.3.2.1 SO_2, NOx and PM10 Emissions

The bases and calculation methods used to estimate PAE for SO_2, NOx and PM10 are described in Section 3.2.2. As discussed in Section 3.3.1.1, all filterable PM emissions are assumed to be PM10.

3.3.2.2 Greenhouse Gas (GHG) Emissions

The PAE of GHG (as CO_2e) from sulfur burning are estimated based on the projected actual H_2SO_4 production rate of 235,000 T/yr and the CO_2e emissions factor of 0.268 lb/T. Below is an example calculation:

Input Data:

Baseline Actual Production (100% H_2SO_4)	=	235,000 T/yr
CO_2e Emissions Factor	=	0.268 lb/T

Example Calculation:

CO_2e PAE = (235,000 T/yr) x (0.268 lb/T) x (1 T/2000 lb) = 31.6 T per year

PAE GHG emissions from the startup burner are estimated using the GHG emissions factors for natural gas combustion found at 40 CFR 98, Tables C-1 and C-2 and a projected natural gas consumption rate equal to the maximum rate experienced in the last 10 years. Below is an example calculation:

Input Data:

Projected Actual Gas Firing Rate	=	2.5 MMSCF/yr
CO_2e Emissions Factor	=	119,344 lb/MMSCF

Example Calculation:

CO_2e PAE = (2.5 MMSCF/yr) x (119,344 lb/MMSCF) x (1 T/2000 lb) = 149 T/yr

The total CO_2e PAE from the Lathrop sulfuric acid plant equals the sum of the CO_2e PAE from sulfur combustion and the CO_2e PAE from natural gas combustion, or 181 T/yr.

3.3.2.3 Sulfuric Acid Mist Emissions

PAE of SAM are calculated in an analogous manner as other emissions. The projected actual SAM emissions factor used in this calculation the maximum value derived from the Lathrop acid plant stack tests from 2004 through 2012. This is a value of 0.154 lb/T and it represents an upper limit for expected H_2SO_4 emissions from the Lathrop sulfuric acid plant over the next five years.

3.3.2.4 CO Emissions

The PAE CO emissions are estimated using the burner's permit limit of 36 lb/MMSCF and the projected actual natural gas consumption rate by the startup burner. The same calculation approach is used to estimate these emissions as is used to estimate GHG emissions from the startup burner.

3.3.2.5 Filterable PM Emissions

Filterable PM PAE are estimated as 10% of the PM10 PAE during routine operation of the acid plant. As described previously, this 10% factor is based on engineering judgment and review of test data from other Simplot acid plants. Filterable PM PAE from the startup burner are estimated using the AP-42 emissions factor of 1.9 lb/MMSCF and the natural gas consumption rate during the baseline period. The same calculation approach is used to estimate these emissions as is used to estimate the CO_2e emissions from the startup burner.

3.3.2.6 H_2S/TRS/RSC Emissions

The PAE H_2S/TRS/RSC emissions from elemental sulfur storage, handling, and unloading operations are estimated using the same method used to estimate BAE of these pollutants. An example calculation is provided below:

Input Data:

Projected Actual Production (100% H_2SO_4)	=	235,000 T/yr
H_2SO_4-to-Sulfur Ratio	=	3 (T H_2SO_4/T S)
Dissolved H_2S Concentration	=	1 ppmw

Example Calculation:

H_2S BAE = (235,000 T/yr) x (1 T S/3 T H_2SO_4) x (1 T $H_2S/10^6$ T S) = 0.08 T/yr

3.3.2.7 Projected Actual Emissions Summary

Table 3-9 summarizes the estimated PAE computed using the methods described above.

Table 3-9. Projected Actual Emissions from the Lathrop Sulfuric Acid Plant

Pollutant	PAE (T/yr)
CO	0.04
NOx	10.8
SO_2	200
PM	1.8
PM_{10}	20.1
H_2SO_4 Mist	18.2
H_2S/TRS/RSC	0.08
GHGs (CO_2e)	181

3.3.3 Unused Baseline Capacity Emissions

The following discussion provides a description of the calculation methodology used to estimate unused baseline capacity emissions including example calculations. As described in Section 3.2.3, these estimates are based on the underlying estimate that the various equipment repair and replacement activities that Simplot is planning will result in a reduction in unscheduled downtime of as much as 0.6%, which equates to a project-related increase in projected annual sulfuric acid production of 1,211 T/yr.

3.3.3.1 SO_2 Emissions

Because the project will result in a reduction in the SO_2 emissions capability of the Lathrop acid plant relative to the baseline, there are no UBCE of SO_2 (i.e., the post-project emission rates of SO_2 from the acid plant stack are related to the project). UBCE emissions of SO_2 from other operations (*e.g.*, storage, handling, and loadout of product acid) are negligible. Thus, the SO_2 UBCE are assumed to be zero.

3.3.3.2 NOx and PM10 Emissions

The bases and calculation methods used to estimate UBCE for NOx and PM10 are described in Section 3.2.3.2. As discussed in Section 3.3.1.1, all filterable PM emissions are assumed to be PM10.

3.3.3.3 Greenhouse Gas (GHG) Emissions

The UBCE of GHG (as CO_2e) from sulfur burning are estimated using a baseline sulfuric acid production capability of 233,789 tons per year[28] and the CO_2e emissions factor of 0.268 lb/T. The UBCE are computed as the difference between the baseline capacity emissions and the baseline actual emissions. Below is an example calculation:

Input Data:

Baseline Production Capacity (100% H_2SO_4)	=	233,789 T/yr
CO_2e EF	=	0.268 lb/T

[28] This value represents Simplot estimate of the capacity of the sulfuric acid plant during the selected baseline period. This estimate is based on an average daily production rate of 700 tons and an estimated 344 days per year of operation adjusted for unscheduled downtime of 0.6% (*i.e.*, 700 T/d x 336 days/yr x (1-0.006) = 233,7898 T/yr). Production levels during the baseline were lower than this value due to lack of demand for product acid.

CO_2e BAE = 23.5 T/yr

Example Calculation:

CO_2e UBCE = (233,789 T/yr) x (0.268 lb CO_2e/T) / (2,000 lb/T) – (23.5 T/yr) = 7.9 T/yr

The UBCE GHG (as CO_2e) emissions from the startup burner are estimated using the GHG emissions factors for natural gas combustion found at 40 CFR 98, Tables C-1 and C-2 and an assumed baseline capacity natural gas consumption rate equal to the maximum rate experienced in the last 10 years. Below is an example calculation:

Input Data:

Startup Burner Baseline Capacity Gas Firing Rate = 2.5 MMSCF/yr
CO_2e Emissions Factor = 119,344 lb/MMSCF
CO_2e BAE = 109 T/yr

Example Calculation:

CO_2e UBCE = (2.5 MMSCF/yr) x (119,344 lb/MMSCF) x (1 T/2000 lb) – 109T/yr = 40.6 T/yr

The total CO_2e UBCE from the Lathrop sulfuric acid plant equals the sum of the CO_2e UBCE from sulfur combustion and the GHG UBCE from natural gas combustion, or 48.5 T/yr.

3.3.3.4 Sulfuric Acid Mist Emissions

UBCE for SAM are estimated in a manner analogous to the calculation used to estimate the UBCE of CO_2e. The SAM emissions factor used in this estimate is the same as the factor of 0.154 lb/T used to estimate PAE of SAM. The baseline production is identical to that used in the CO2e calculations above.

3.3.3.5 CO Emissions

The UBCE CO emissions are estimated using the startup burner permit limit of 36 lb/MMSCF and an assumed baseline capacity natural gas consumption rate equal to the maximum rate experienced in the last 10 years. The same calculation approach is used to estimate these emissions as is used to estimate CO_2e emissions from the startup burner.

3.3.3.6 Filterable PM Emissions

Filterable PM UBCE are estimated as 10% of the PM10 UBCE during routine operation of the acid plant. This 10% factor is based on engineering judgment and review of test data from other Simplot acid plants. Filterable PM UBCE from the startup burner are estimated using the AP-42 emissions factor of 1.9 lb/MMSCF and an assumed baseline capacity natural gas consumption rate equal to the maximum rate experienced in the last 10 years. The same calculation approach is used to estimate these emissions as is used to estimate CO_2e emissions from the startup burner.

3.3.3.7 H_2S/TRS/RSC Emissions

The UBCE H_2S/TRS/RSC emissions from elemental sulfur storage, handling, and unloading operations are estimated using the same method used to estimate BAE and PAE of these pollutants. An example calculation is provided below:

Input Data:

Baseline Production Capacity (100% H_2SO_4)	=	233,789 T/yr
H_2SO_4-to-Sulfur Ratio	=	3 (T H_2SO_4/T S)
Dissolved H_2S Concentration	=	1 ppmw
H_2S BAE	=	0.08 T/yr

Example Calculation:

H_2S UBCE = (233,789 T/yr) x (1 T S/3 T H_2SO_4) x (1 T $H_2S/10^6$ T S) – 0.08 T/yr = 0.02 T/yr

3.3.3.8 UBCE Emissions Summary

Table 3-10 summarizes the UBCE computed using the above described approach.

Table 3-10. UBCE of the Lathrop Sulfuric Acid Plant

Pollutant	PAE (T/yr)
CO	0.01
NOx	3.6
SO_2	0
PM	0.7
PM_{10}	7.5
H_2SO_4 Mist	6.7
H_2S/TRS/RSC	0.02
GHGs (CO_2e)	48.5

3.3.4 Actual-to-Projected Actual Project Emissions Increase

Table 3-11 summarizes the project's emissions increase on an actual-to-projected actual basis and compares that increase to the PSD Major Modification thresholds. As shown in the table, the project does not constitute a PSD Major Modification.

Table 3-11. Project Emissions Change on an Actual-to-Projected Actual Basis

Pollutant	PSD Significance Threshold (T/yr)	BAE (T/yr)	UBCE (T/yr)	PAE (T/yr)	Project Δ [PAE-UBCE-BAE] (T/yr)	PSD Major Modification?
CO	100	0.03	0.01	0.04	0.00	No
NOx	40	7.1	3.6	10.8	0.1	No
SO_2	40	268	0	200	-68	No
PM [a]	25	1.13	0.67	1.81	0.01	No
PM10 [b]	15	12.5	7.5	20.1	0.1	No
H_2SO_4 Mist	7	11.4	6.7	18.2	0.1	No
H_2S/TRS/RSC	10	0.06	0.02	0.08	0.00	No
GHGs (CO_2e)	75,000	132	48.5	181	0.2	No

3.4 Emission Reduction Credits

Emission Reduction Credits (ERCs) are determined based on Actual Emission Reductions (AERs). The catalyst replacement project will result in a substantial reduction in actual emissions of SO_2 from the Lathrop sulfuric acid plant. AER are calculated, as follows:

AER = HAE - PE2

Where:

HAE = Historic Actual Emissions; and

PE2 = Post-project Potential to Emit.

The Historic Actual Emissions of SO_2 from the sulfuric acid plant stack are determined based on CEMS data from the period April 1, 2011 through March 31, 2013. These emissions are identical to the BAE SO_2 emissions as described in Section 3.1.1.1. Fugitive emissions are estimated based on production data and engineering calculations which are also described in Section 3.1.1.1. As described previously, these emissions were adjusted downward to account for all periods of non-compliance with the applicable emissions limits found in Permit N-767-9-12 including:

- SOx <= 4 lb/T (excluding Startup/Shutdown events);
- SOx <= 21.5 lb/T (during Startup/Shutdown events);
- SO_2 <= 2,461 lb/day; and
- SOx <= 2,000 ppmvd (15-minute average).

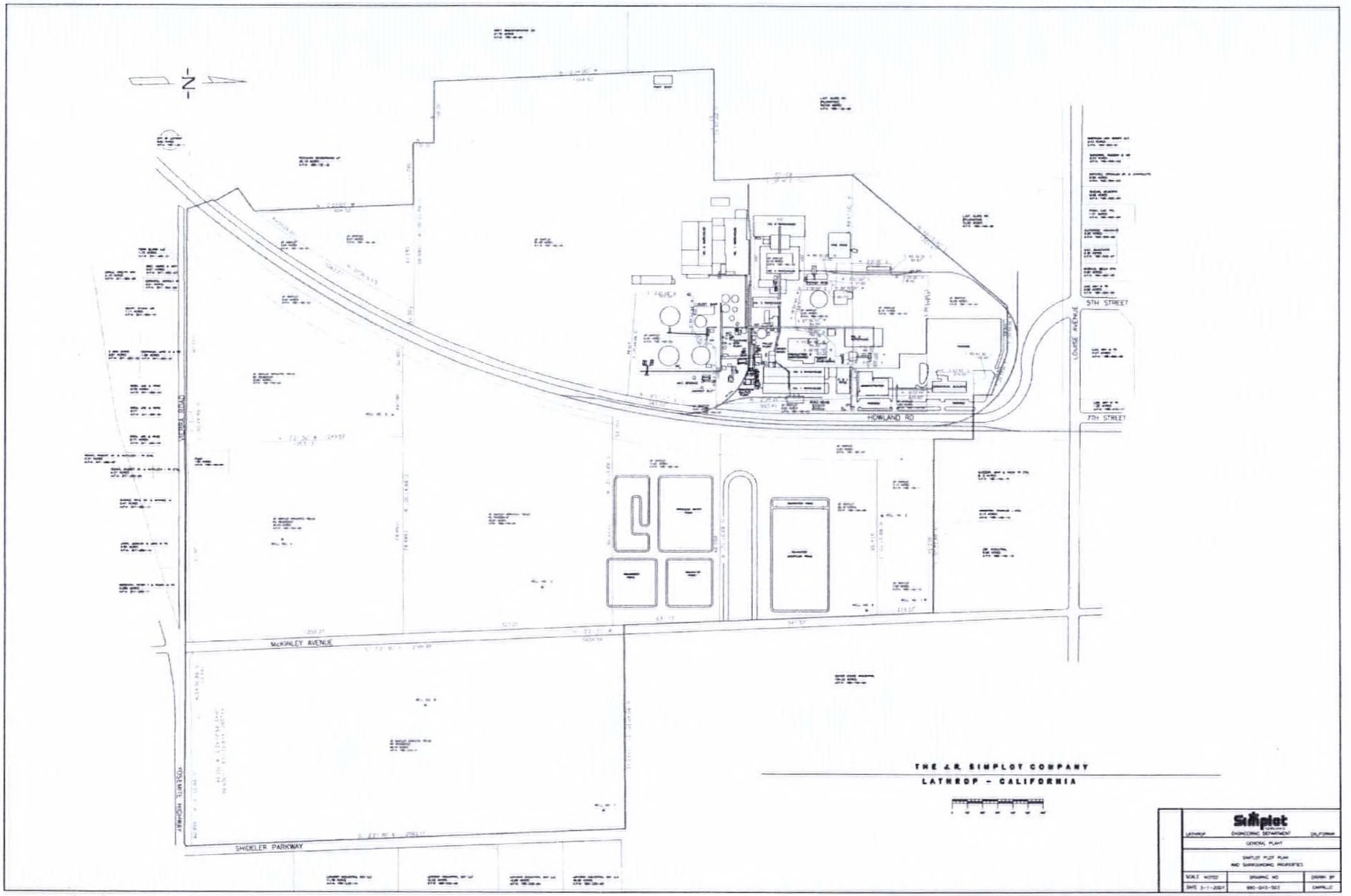
Based on the adjusted CEMS data, the acid plant's HAE of SO_2 averaged 268 tons/year during the 2-year baseline period.[29] Simplot is requesting a post-project limit on emissions of SO_2 of 205 tons/year. Compliance with this limit will be determined using the existing CEMS. The requested limit results in an AER of 63 tons per year of SO_2 as shown below:

AER = (268 T/yr) – (205 T/yr) = 63 T/yr

This AER value serves as the basis for the ERC determination.

[29] The raw and adjusted data can be found in Appendix C of this application.

Appendix B
Plot Plan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LATHROP - CALIFORNIA
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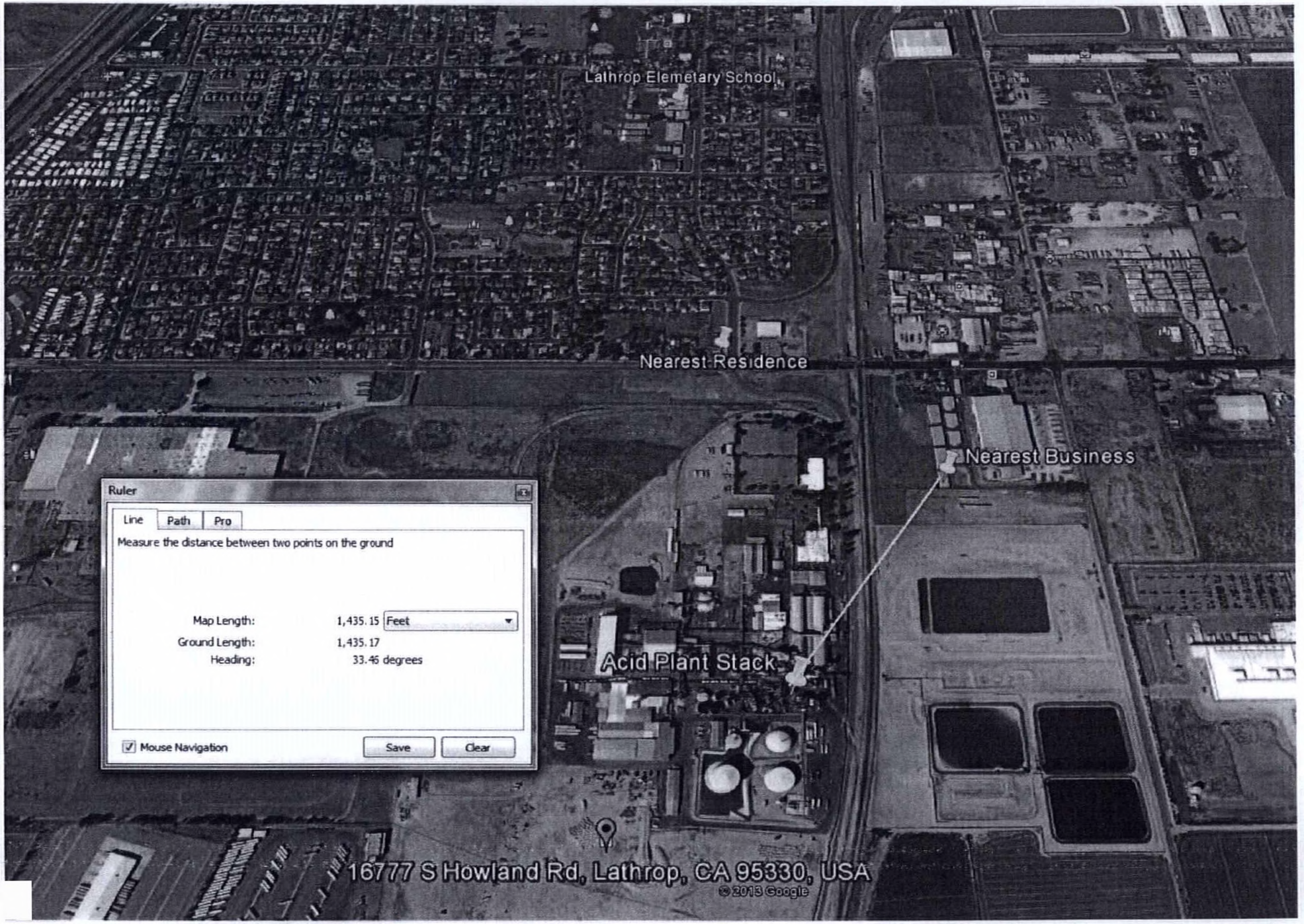
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Ground Length:
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33.46 degrees
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16777 S Howland Rd, Lathrop, CA 95330, USA
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Appendix C
Emissions Calculations & Data Sheets

Project Emissions Summaries

	H2SO4	NOx	SO2	PM	PM10	PM2.5	CO2e	H2S	CO	VOC
	Totals for All Affected Units / Emissions Sources									
BE (lb/yr) =	76,878	14,282	536,317	2,268	84,553	84,553				5.642
HAE (lb/yr) =	228	113	536,317	3	238	238				5.642
PE (lb/yr) =	76,985	40,649	410,296	7,705	84,756	84,756				65.1
PE2 (lb/yr) =	335	1,302	410,296	40	441	441				65.1
BAE (lb/yr) =	22,875	14,282	536,317	2,268	25,078	25,078	264,160	117	66	6
PAE (lb/yr) =	36,497	21,540	399,723	3,624	40,269	40,269	361,490	157	89	8
UBCE (lb/yr) =	13,434	7,147	56	1,337	14,984	14,984	96,952	39	24	2
Act-to-PE Δ [PE - HAE] (lb/yr) =	76,757	40,536	-126,021	7,701	84,519	84,519				59
Actual Emission Reductions [HAE-PE2] (lb/yr) =	-107	-1,189	126,021	-36	-204	-204				-59
ATPA Δ [PAE - EE - BAE] (lb/yr) =	188	110	-136,650	19	207	207	379	1	0	0
	Totals for All Affected Units / Emissions Sources									
AE (T/yr) =	38.4	7.1	268.2	1.1	42.3	42.3				0.0
HAE (T/yr) =	0.1	0.1	268.2	0.0	0.1	0.1				0.0
PE (T/yr) =	38.5	20.3	205.1	3.9	42.4	42.4				0.0
PE2 (T/yr) =	0.2	0.7	205.1	0.0	0.2	0.2				0.0
BAE (T/yr) =	11.4	7.1	268.2	1.1	12.5	12.5	132.1	0.06	0.0	0.0
PAE (T/yr) =	18.2	10.8	199.9	1.8	20.1	20.1	180.7	0.08	0.0	0.0
UBCE (T/yr) =	6.7	3.6	0.0	0.7	7.5	7.5	48.5	0.02	0.0	0.0
Act-to-PE Δ [PE - HAE] (T/yr) =	38.4	20.3	-63.0	3.9	42.3	42.3				0.0
Actual Emission Reductions [HAE-PE2] (T/yr) =	-0.1	-0.6	63.0	0.0	-0.1	-0.1				0.0
ATPA Δ [PAE - EE - BAE] (T/yr) =	0.1	0.1	-68.3	0.0	0.1	0.1	0.2	0.0	0.0	0.0

Project Emissions Summaries

	H2SO4	NOx	SO2	PM	PM10	PM2.5	CO2e	H2S	CO	VOC
	Sulfuric Acid Plant (excluding startup burner)									
AE (lb/yr) =	76,650	14,170	536,151	2,265	84,315	84,315				-
HAE (lb/yr) =	0	0	536,151	0	0	0				-
PE (lb/yr) =	76,650	39,347	410,000	7,665	84,315	84,315				-
PE2 (lb/yr) =	0	0	410,000	0	0	0				-
BAE (lb/yr) =	22,647	14,170	536,151	2,265	24,840	24,840	46,954	-	-	-
PAE (lb/yr) =	36,190	21,385	399,500	3,619	39,950	39,950	63,131	-	-	-
UBCE (lb/yr) =	13,357	7,105	0	1,336	14,904	14,904	15,798	-	-	-
Act-to-PE Δ [PE - HAE] (lb/yr) =	76,650	39,347	-126,151	7,665	84,315	84,315				-
Actual Emission Reductions [PE2 - HAE] (lb/yr) =	0	0	126,151	0	0	0				-
ATPA Δ [PAE - EE - BAE] (lb/yr) =	187	110	-136,651	19	206	206	379	-	-	-
	Sulfuric Acid Plant (excluding startup burner)									
AE (T/yr) =	38.3	7.1	268.1	1.1	42.2	42.2				
HAE (T/yr) =	0.0	0.0	268.1	0.0	0.0	0.0				
PE (T/yr) =	38.3	19.7	205.0	3.8	42.2	42.2				
PE2 (T/yr) =	0.0	0.0	205.0	0.0	0.0	0.0				
BAE (T/yr) =	11.3	7.1	268.1	1.1	12.4	12.4	23.5			
PAE (T/yr) =	18.1	10.7	199.8	1.8	20.0	20.0	31.6			
UBCE (T/yr) =	6.7	3.6	0.0	0.7	7.5	7.5	7.9			
Act-to-PE Δ [PE - HAE] (T/yr) =	38	20	-63	4	42	42				-
Actual Emission Reductions [HAE-PE2] (T/yr) =	0	0	63	0	0	0				-
ATPA Δ [PAE - EE - BAE] (T/yr) =	0	0	-68	0	0	0	0	-	-	-

Project Emissions Summaries

	H2SO4	NOx	SO2	PM	PM10	PM2.5	CO2e	H2S	CO	VOC
	Fugitive / Unattributed Emisisons									
AE (lb/yr) =	228	-	161	-	228	228				-
HAE (lb/yr) =	228	-	161	-	228	228				-
PE (lb/yr) =	334	-	235	-	334	334				-
PE2 (lb/yr) =	334	-	235	-	334	334				-
BAE (lb/yr) =	228	-	161	-	228	228	-	117	-	-
PAE (lb/yr) =	307	-	216	-	307	307	-	157	-	-
UBCE (lb/yr) =	77	-	54	-	77	77	-	39	-	-
Act-to-PE Δ [PE - HAE] (lb/yr) =	106	-	74	-	106	106				-
Actual Emission Reductions [HAE-PE2] (lb/yr) =	-106	-	-74	-	-106	-106				-
ATPA Δ [PAE - EE - BAE] (lb/yr) =	2	-	1	-	2	2	-	1	-	-
	Fugitive / Unattributed Emisisons									
AE (T/yr) =	0.1		0.1		0.1	0.1		0.0		
HAE (T/yr) =	0.1		0.1		0.1	0.1		0.0		
PE (T/yr) =	0.2		0.1		0.2	0.2		0.0		
PE2 (T/yr) =	0.2		0.1		0.2	0.2		0.0		
BAE (T/yr) =	0.1		0.1		0.1	0.1		0.06		
PAE (T/yr) =	0.2		0.1		0.2	0.2		0.08		
UBCE (T/yr) =	0.0		0.0		0.0	0.0		0.02		
Act-to-PE Δ [PE - HAE] (T/yr) =	0		0		0	0		0		
Actual Emission Reductions [HAE-PE2] (T/yr) =	0		0		0	0		0		
ATPA Δ [PAE - EE - BAE] (T/yr) =	0		0		0	0		0		

Project Emissions Summaries

	H2SO4	NOx	SO2	PM	PM10	PM2.5	CO2e	H2S	CO	VOC
	Sulfuric Acid Plant Startup Burner									
AE (lb/yr) =	0	113	5	3	9	9				6
HAE (lb/yr) =	0	113	5	3	9	9				6
PE (lb/yr) =	1	1,302	61	40	107	107				65
PE2 (lb/yr) =	1	1,302	61	40	107	107				65
BAE (lb/yr) =	0	113	5	3	9	9	217,205		66	6
PAE (lb/yr) =	0	155	7	5	13	13	298,359		89	8
UBCE (lb/yr) =	0	42	2	1	3	3	81,154		24	2
Act-to-PE Δ [PE - HAE] (lb/yr) =	1	1,189	56	36	98	98	0		0	59
Actual Emission Reductions [PE2 - HAE] (lb/yr) =	-1	-1,189	-56	-36	-98	-98	0		0	-59
ATPA Δ [PAE - EE - BAE] (lb/yr) =	0	0	0	0	0	0	0		0	0
	Sulfuric Acid Plant Startup Burner									
AE (T/yr) =	0.0	0.1	0.0	0.0	0.0	0.0	0.0		0.0	0.0
HAE (T/yr) =	0.0	0.1	0.0	0.0	0.0	0.0	0.0		0.0	0.0
PE (T/yr) =	0.0	0.7	0.0	0.0	0.1	0.1	0.0		0.0	0.0
PE2 (T/yr) =	0.0	0.7	0.0	0.0	0.1	0.1	0.0		0.0	0.0
BAE (T/yr) =	0.0	0.1	0.0	0.0	0.0	0.0	108.6		0.0	0.0
PAE (T/yr) =	0.0	0.1	0.0	0.0	0.0	0.0	149.2		0.0	0.0
UBCE (T/yr) =	0.0	0.0	0.0	0.0	0.0	0.0	40.6		0.0	0.0
Act-to-PE Δ [PE - AE] (T/yr) =	0	1	0	0	0	0	0		0	0
Actual Emission Reductions [HAE-PE2] (T/yr) =	0	-1	0	0	0	0	0		0	0
ATPA Δ [PAE - EE - BAE] (T/yr) =	0	0	0	0	0	0	0		0	0

Acid Plant Stack Emissions

	H2SO4	NOx	SO2	PM	PM10	PM2.5	CO2e	NOTES / BASIS
Baseline Emission (BE) Estimates								
Start Date =	04-01-11	04-01-11	04-01-11	04-01-11	04-01-11	04-01-11	04-01-11	Most recent 8 quarters.
End Date =	03-31-13	03-31-13	03-31-13	03-31-13	03-31-13	03-31-13	03-31-13	
BE Average EF (lb/T) =	0.129	0.081	3.06	0.013	0.142	0.142	0.268	**[A], [B], [C], [D]**
Production (T/yr) =	174,932	174,932	174,932	174,932	174,932	174,932	174,932	Actual average production in baseline period.
Est. Actual Emissions (T/yr) =	11.3	7.1	268	1.1	12.5	12.5	23.5	= (BE Avg EF) x (Production) / (2,000 lb/T); **[D]**.
Potential Production (T/yr) =	255,500	255,500	255,500	255,500	255,500	255,500	255,500	Based on 700 T/day, 365 days/yr.
Allowable/Potential EF (lb/T) =	0.30	0.154	3.52	0.03	0.33	0.33	0.27	**[J], [L], [C], [D]**
Pre-project PE (T/yr) =	38.3	19.7	449.1	3.8	42.2	42.2	34.3	= (Allowable EF) x (Potential Production) / (2,000 lb/T).
Highly Utilized Unit =	NO	NO	NO	NO	NO	NO	NO	
Clean Unit =	YES	NO	NO	NO	YES	YES	NO	H2SO4, PM10, & PM2.5 controlled by mist eliminators @ >95%.
BE (T/yr) =	38.3	7.1	268.1	1.1	42.2	42.2	23.5	= PTE for Clean Unit pollutants; actual emissions for others.
Historic Actual Emissions Estimates (HAE)								
Start Date =			04-01-11					Most recent 8 quarters.
End Date =			03-31-13					
HAE (T/yr) =			268.1					**[D]**
Baseline Actual Emissions (BAE) Estimates								
Start Date =	04-01-11	04-01-11	04-01-11	04-01-11	04-01-11	04-01-11	04-01-11	Most recent 8 quarters.
End Date =	03-31-13	03-31-13	03-31-13	03-31-13	03-31-13	03-31-13	03-31-13	
BAE EF (lb/T) =	0.129	0.081	3.06	0.013	0.142	0.142	0.268	**[A], [B]**
Average Production (T/yr) =	174,932	174,932	174,932	174,932	174,932	174,932	174,932	Actual average production in baseline period.
BAE (T/yr) =	11.3	7.08	268	1.13	12.42	12.42	23.48	= (BAE Avg EF) x (Production) / (2,000 lb/T); **[D]**.
Projected Actual Emissions (PAE) Estimates								
Projected Production [PAE_P] (T/d) =	700	700	700	700	700	700	700	Design capacity of Lathrop sulfuric acid plant.
Projected EF [PAE_EF] (lb/T) =	0.154	0.091	1.70	0.015	0.17	0.17	0.268	**[E], [F], [O]**
Projected Operating Days [PAE_D] (days/yr) =	336	336	336	336	336	336	336	See 'Constants' sheet.
PAE = [PAE_P x PAE_EF x PAE_D] (T/yr) =	18.1	10.7	199.8	1.8	20.0	20.0	31.6	
Unused Baseline Capacity Emissions (UBCE) Estimates								
Baseline Production Capacity [BPC] (T/yr) =	233,789	233,789		233,789	233,789	233,789	233,789	**[M]**
Unused Baseline Production EF [UBP_EF] (lb/T) =	0.154	0.091		0.015	0.170	0.170	0.268	**[E], [F], [H]**
UBCE = [BPC x UBP_EF - BAE] (T/yr) =	6.68	3.55	0	0.67	7.45	7.45	7.90	**[N]**
Potential to Emit (PE and PE2) Estimates								
Potential Production [PE_P] (T/d) =	700	700		700	700	700	700	
Potential EF [PE_EF] (lb/T) =	0.30	0.154		0.03	0.33	0.33	0.268	**[I], [J]**
Potential Operating Days [PE_D] (days/yr)	365	365		365	365	365	365	
PE = [PE_P x PE_EF x PE_D] (T/yr) =	38.3	19.7	205	3.8	42.2	42.2	34.3	**[H]**

Acid Plant Stack Emissions

Analysis Results								
BE (T/yr) =	38.3	7.1	268.1	1.1	42.2	42.2	23.5	
HAE (T/yr) =			268.1					
PE (T/yr) =	38.3	19.7	205.0	3.8	42.2	42.2	34.3	
PE2 (T/yr) =			205.0					
BAE (T/yr) =	11.3	7.1	268.1	1.1	12.4	12.4	23.5	
PAE (T/yr) =	18.1	10.7	199.8	1.8	20.0	20.0	31.6	
UBCE (T/yr) =	6.7	3.6	0.0	0.7	7.5	7.5	7.9	
Act-to-PE Δ [PE - BE] (T/yr) =	0.0	12.6	-63.1	2.7	0.0	0.0	10.8	
Actual Emission Reductions [PE2 - HAE] (T/yr) =			-63.1					
ATPA Δ [PAE - UBCE - BAE] (T/yr) =	0.09	0.06	-68.3	0.0	0.10	0.10	0.19	

[A] = H2SO4 EF is based on average of stack test data from selected baseline period; 2012 data applied to 2013 production.

[B] = NOx EF is based on average of stack test data from other Simplot acid plants that burn elemental sulfur.

[C] = PM10/2.5 factor/emissions assumed to equal 110% of H2SO4 factor/emissions.; PM factor estimated at 10% of H2SO4.

[D] = GHG EF derived from data in: "Background Report, AP-42 Section 5.17, Sulfuric Acid," Pacific Environmental Services, Inc., December 3, 1992

[D] = SO2 emissions data from CEMS adjusted downward to account for permit limits.

[E] = H2SO4 EF is based on 99th percentile value of last 9 years of stack test data.

[F] = NOx EF is based on UCI95 of the mean of stack test data from other Simplot acid plants that burn elemental sulfur.

[H] = SO2 PTE equals the proposed 12-month rolling total emission limit.

[I] = H2SO4 EF = permit limit.

[J] = NOx EF is the 99th percentile value from stack test data from other Simplot acid plants that burn elemental sulfur.

[K] = Based on allowable EF of 0.3 lb/T and an assumed maximum production rate of 700 T/d.

[L] = Allowable SO2 EF based on permit limit of 2,461 lb/day and max capacity of acid plant.

[M] = Project is expected to reduce unscheduled downtime by 0.6%; the rest of the differece between the Projected and Baseline Production Rates is due to demand growth.

[N] = Because the project results in a substantial reduction in SO2 emissions, the SO2 UBCE included in the SO2 PAE are zero.

[O] = Post-project design target SO2 emissions rate.

Estimation of Dissolved SO2 in Product & Maximum Possible Fugitive Emissions @ Baseline Actual Production Rate			
Parameter	**Value**	**Units**	**Basis**
Calculation Input Data			
Total Pressure =	106.9	kPa	Final absorber inlet gas pressure
SO2 Gas Mole Fraction =	0.01%	mol. %	Final absorber tower gas feed SO2
Temperature =	190.0	F	Final absorber tower acid bottoms temperature
Temperature =	360.9	K	Unit conversion from °F to °K
Henry's Law Constant =	0.997	kPa/(mmol/kg H2SO4 sol'n.)	For SO2 in 95.91 wt% H2SO4 @ process temperature - from Q. Zhang paper (see Notes)
P_{SO2} =	0.007	kPa	Gas in and acid out assumed to be in equilibrium.
Baseline 100% H2SO4 Production =	174,932	T/yr	Potential 100% H2SO4 production
Baseline Actual Operating Hours =	7,896	hr/yr	Operating hours during baseline period (from acid plant downtime reports).
Calculations			
C_{SO2} =	0.007	mmol/kg H2SO4 sol'n	= (PSO2) / (Henry's Law Constant)
Projected 98.8% H2SO4 Production =	177,057	tons/yr	Production of 98.8% solution (concentration at exit of Absorbing Tower)
Projected 98.8% H2SO4 Production =	160,623,382	kg/yr	Unit conversion from T/yr to kg/yr.
SO2 in H2SO4 Product	0.08	tons/yr	= (Projected 98.8% H2SO4 Production) x (CSO2) / (1,000 mg/g) / (453.6 g/lb) x (64 lb SO2/lb-mol) / (2,000 lb/ton)
Assumed Loss Factor =	100%	wt. %	Worst-case scenario; actual losses are likely to be less (see notes)
BAE Fugitive SO2 Emissions =	0.08	T/yr	= (Assumed Loss Factor) x (SO2 in H2SO4 Product)
Average Hourly Fugitive SO2 Emissions =	0.5	lb/day	= (BAE Fugitive SO2 Emissions - T/yr) x (2,000 lb/T) / (Baseline Actual Operating Hours) x (24 hr/day)

NOTES:

- SO2 solubility data from "Solubility of Sulfur Dioxide in Sulfuric Acid of High Concentration", Ind. Eng. Chem. Res. 1998, 37, 1167 - 1172, Zhang, Q., et. al.
- SO2 has higher solubility at lower temperatures.
- Cooling in main acid pump tank will significantly reduce potential for downstream fugitive SO2 emissions as temperature drops from 230 °F to 164 °F.

SO2 S-H-L UBCE

Estimation of Dissolved SO2 in Product & Maximum Possible Fugitive Emissions @ Unused Baseline Capacity Rate			
Parameter	**Value**	**Units**	**Basis**
Calculation Input Data			
Total Pressure =	106.9	kPa	Final absorber inlet gas pressure.
SO2 Gas Mole Fraction =	0.01%	mol. %	Final absorber tower gas feed SO2.
Temperature =	190.0	F	Final absorber tower acid bottoms temperature.
Temperature =	360.9	K	Unit conversion from °F to °K.
Henry's Law Constant =	0.997	kPa/(mmol/kg H2SO4 sol'n.)	For SO2 in 95.91 wt% H2SO4 @ process temperature - from Q. Zhang paper (see Notes).
P_{SO2} =	0.007	kPa	Gas in and acid out assumed to be in equilibrium.
Baseline 100% H2SO4 Production Capacity =	233,789	T/yr	= (700 tons 100% H2SO4/day) x (336 days/year) x (99.4% of projected production unrelated to the project)
Baseline Operating Hours Capacity =	8,016	hr/yr	= (336 days/yr) x (24 hr/day) x (99.4% of projected production unrelated to the project)
Calculations			
C_{SO2} =	0.007	mmol/kg H2SO4 sol'n.	= (PSO2) / (Henry's Law Constant)
Baseline 98.8% H2SO4 Production Capacity =	236,628	tons/yr	Production of 98.8% solution (concentration at exit of Absorbing Tower)
Baseline 98.8% H2SO4 Production Capacity =	214,665,619	kg/yr	Unit conversion from T/yr to kg/yr.
SO2 in H2SO4 Product	0.11	tons/yr	= (Baseline 98.8% H2SO4 Production Capacity) x (CSO2) / (1,000 mg/g) / (453.6 g/lb) x (64 lb SO2/lb-mol) / (2,000 lb/ton)
Assumed Loss Factor =	100%	wt. %	Worst-case scenario; actual losses are likely to be less (see notes)
Baseline Capacity Fugitive SO2 Emissions =	0.11	T/yr	= (Assumed Loss Factor) x (SO2 in H2SO4 Product)
BAE Fugitive SO2 Emissions =	0.08	T/yr	See 'SO2 S-H-L BAE' sheet.
Unused Baseline Capacity SO2 Emissions =	0.03	T/yr	= (Baseline Capacity Fugitive SO2 Emissions) - (BAE Fugitive SO2 Emissions)
Average Hourly Fugitive SO2 Emissions =	0.2	lb/day	= (Unused Baseline Capacity SO2 Emissions - T/yr) x (2,000 lb/T) / (Baseline Operating Hours Capacity) x (24 hr/day)

NOTES:

- SO2 solubility data from: "Solubility of Sulfur Dioxide in Sulfuric Acid of High Concentration"; Ind. Eng. Chem. Res. 1998, 37, 1167 - 1172; Zhang, Q., et. al.
- SO2 has higher solubility at lower temperatures.
- Cooling in main acid pump tank will significantly reduce potential for downstream fugitive SO2 emissions as temperature drops from 230 °F to 164 °F.

Estimation of Dissolved SO2 in Product & Maximum Possible Fugitive Emissions @ Projected Production Rate			
Parameter	Value	Units	Basis
Calculation Input Data			
Total Pressure =	106.9	kPa	Final absorber inlet gas pressure.
SO2 Gas Mole Fraction =	0.01%	mol. %	Final absorber tower gas feed SO2.
Temperature =	190.0	F	Final absorber tower acid bottoms temperature.
Temperature =	360.9	K	Unit conversion from °F to °K.
Henry's Law Constant =	0.997	kPa/(mmol/kg H2SO4 sol'n.)	For SO2 in 95.91 wt% H2SO4 @ process temperature - from Q. Zhang paper (see Notes).
P_{SO2} =	0.007	kPa	Gas in and acid out assumed to be in equilibrium.
Projected 100% H2SO4 Production =	235,000	tons/yr	Projected Acid Plant Production = (700 tons 100% H2SO4/day) x (336 days/year)
Projected Actual Operating Hours =	8,064	hr/yr	= (336 days/yr) x (24 hr/day)
Calculations			
C_{SO2} =	0.007	mmol/kg H2SO4 sol'n.	= (PSO2) / (Henry's Law Constant)
Projected 98.8% H2SO4 Production =	237,854	tons/yr	Production of 98.8% solution (concentration at exit of Absorbing Tower).
Projected 98.8% H2SO4 Production =	215,777,747	kg/yr	Unit conversion from T/yr to kg/yr.
SO2 in H2SO4 Product	0.11	tons/yr	= (Projected 98.8% H2SO4 Production) x (CSO2) / (1,000 mg/g) / (453.6 g/lb) x (64 lb SO2/lb-mol) / (2,000 lb/ton)
Assumed Loss Factor =	100%	wt. %	Worst-case scenario; actual losses are likely to be less (see notes).
Projected Actual Fugitive SO2 Emissions =	0.11	tons/yr	= (Assumed Loss Factor) x (SO2 in H2SO4 Product)
Projected Average Hourly SO2 Emissions =	0.6	lb/day	= (Projected Actual Fugitive SO2 Emissions - T/yr) x (2,000 lb/T) / (Projected Actual Operating Hours) x (24 hr/day)

NOTES:

- SO2 solubility data from: "Solubility of Sulfur Dioxide in Sulfuric Acid of High Concentration", Ind. Eng. Chem. Res. 1998, 37, 1167 - 1172; Zhang, Q., et. al.
- SO2 has higher solubility at lower temperatures.
- Cooling in main acid pump tank will significantly reduce potential for downstream fugitive SO2 emissions as temperature drops from 230 °F to 164 °F.

Estimation of Dissolved SO2 in Product & Maximum Possible Fugitive Emissions @ Potential Production Rate			
Parameter	**Value**	**Units**	**Basis**
Calculation Input Data			
Total Pressure =	106.9	kPa	Final absorber inlet gas pressure.
SO2 Gas Mole Fraction =	0.01%	mol. %	Final absorber tower gas feed SO2.
Temperature =	190.0	F	Final absorber tower acid bottoms temperature.
Temperature =	360.9	K	Unit conversion from °F to °K.
Henry's Law Constant =	0.997	kPa/(mmol/kg H2SO4 sol'n.)	For SO2 in 95.91 wt% H2SO4 @ process temperature - from Q. Zhang paper (see Notes).
P_{SO2} =	0.007	kPa	Gas in and acid out assumed to be in equilibrium.
Potential 100% H2SO4 Production =	256,000	tons/yr	Potential Acid Plant capacity = (700 tons 100% H2SO4/day) × (365 days/year)
Potential Operating Hours =	8,760	hr/yr	= (365 days/yr) x (24 hr/day)
Calcuations			
C_{SO2} =	0.007	mmol/kg H2SO4 sol'n.	= (PSO2) / (Henry's Law Constant)
Potential 98.8% H2SO4 Production =	259,109	tons/yr	Production of 98.8% solution (concentration at exit of Absorbing Tower).
Potential 98.8% H2SO4 Production =	235,060,014	kg/yr	Unit conversion from T/yr to kg/yr.
SO2 in H2SO4 Product	0.12	tons/yr	= (Potential 98.8% H2SO4 Production) x (CSO2) / (1,000 mg/g) / (453.6 g/lb) x (64 lb SO2/lb-mol) / (2,000 lb/ton)
Assumed Loss Factor =	100%	wt. %	Worst-case scenario; actual losses are likely to be less (see notes)
Potential Fugitive SO2 Emissions =	0.12	tons/yr	= (Assumed Loss Factor) x (SO2 in H2SO4 Product)
Potential Hourly SO2 Emissions =	0.6	lb/day	= (Potential Fugitive SO2 Emissions - T/yr) x (2,000 lb/T) / (Potential Operating Hours) x (24 hr/day)

NOTES:

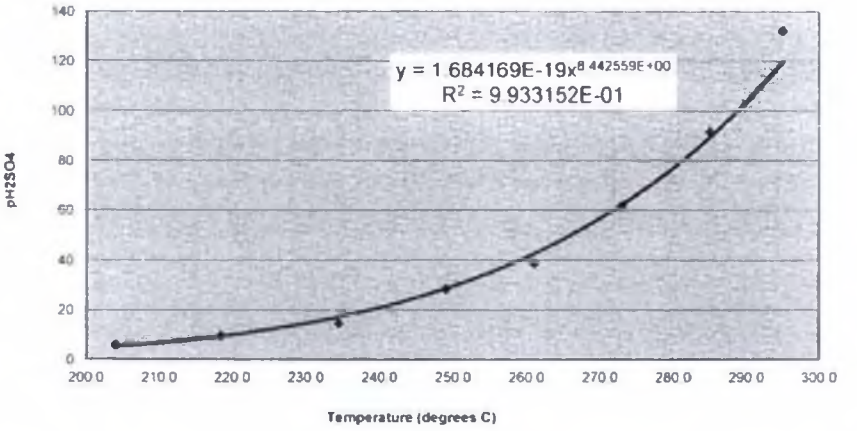
- SO2 solubility data from: "Solubility of Sulfur Dioxide in Sulfuric Acid of High Concentration"; Ind. Eng. Chem. Res. 1998, 37, 1167 - 1172; Zhang, Q., et. al.
- SO2 has higher solubility at lower temperatures.
- Cooling in main acid pump tank will significantly reduce potential for downstream fugitive SO2 emissions as temperature drops from 230 °F to 164 °F.

Baseline Actual Emissions - H_2SO_4 Tanks, Handling & Loadout Operations

Parameter		Value	Units	Basis
Calculation Input Data				
Baseline Actual H2SO4 Production	=	174,932	tons/yr	Future projected #400 Plant capacity = 2,500 tons 100% H2SO4/day × 365 days/year
Number of Acid Storage Tanks (inc. Truck Filling)	=	5		Main acid tank, dilution/product tank, intermediate storage tank, final storage tank, & loadout.
H2SO4 Liquid Density	=	15.0	lb/gal	
Tank Temperature	=	240	°F	Max. temp of acid in tanks.
Tank Temperature	=	116	°C	Max. temp of acid in tanks.
Baseline Actual Operating Hours	=	7,896	hr/yr	Operating hours during baseline period (from acid plant downtime reports).
Calculations				
Volume of Acid Produced	=	3,115,730	ft3	= (Baseline Actual H2SO4 Production) x (2,000 lb/ton) / (H2SO4 Liquid Density lb/gal) / (7.48 gal/ft3)
Maximum Vapor Displacement Rate	=	15,578,650	ft3	= (Volume of acid produced) x (Mumber of tanks)
H_2SO_4 Conc. in Displaced Vapor @ 100% saturation	=	57.7	ppmv	Extrapolation of Perry's data; see figure below for equation.
Baseline Actual H_2SO_4 Emissions	=	0.11	tpy	= (Volume of vapor displaced) x (saturation concentration) x (conversion factors)
Average Hourly H_2SO_4 Emissions	=	0.7	lb/day	= (Baseline Actual H2SO4 Emissions - T/yr) x (2,000 lb/T) / (Baseline Actual Operating Hours) x (24 hr/day)

Vapor Pressure Data from Perry's 5th Edition; Table 3-14.

Temp. (°C)		pH_2SO_4 (mmHg)
204.0	@	5.9
218.5	@	9.8
234.5	@	14.7
249.0	@	28.5
261.0	@	38.8
273.0	@	61.9
285.0	@	91.6
295.0	@	132.3

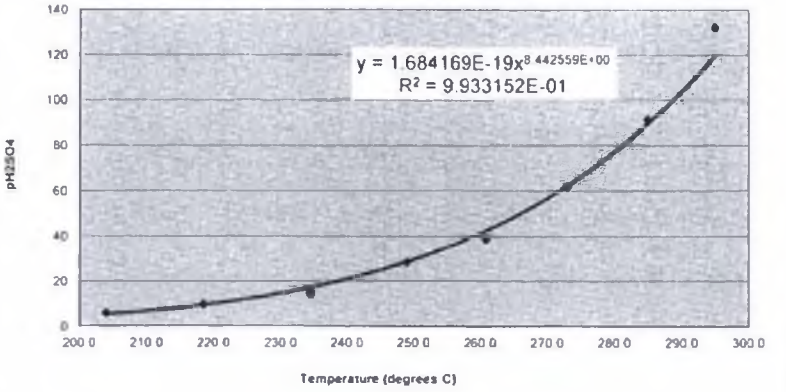


Unused Baseline Capacity Emissions - H_2SO_4 Tanks, Handling & Loadout Operations

Parameter		Value	Units	Basis
Calculation Input Data				
Baseline H2SO4 Production Capacity	=	233,789	tons/yr	= (700 tons 100% H2SO4/day) x (336 days/year) x (99.4% of projected production unrelated to the project)
Number of Acid Storage Tanks (inc. Truck Filling)	=	5		
H2SO4 Liquid Density	=	15.0	lb/gal	
Tank Temperature	=	240	°F	Max. temp of acid in tanks.
Tank Temperature	=	116	°C	Max. temp of acid in tanks.
Baseline Operating Hours Capacity	=	8,016	hr/yr	= (336 days/yr) x (24 hr/day) x (99.4% of projected production unrelated to the project)
Calculations				
Volume of Acid Produced	=	4,164,027	ft3	= (Baseline H2SO4 Production Capacity) x (2,000 lb/ton) / (H2SO4 Liquid Density lb/gal) / (7.48 gal/ft3)
Maximum Vapor Displacement Rate	=	20,820,135	ft3	= (Volume of acid produced) x (Mumber of tanks)
H_2SO_4 Conc. in Displaced Vapor @ 100% saturation	=	57.7	ppmv	Extrapolation of Perry's data, see figure below for equation.
Baseline Capacity H_2SO_4 Emissions	=	0.15	tons/yr	= (Volume of vapor displaced) x (saturation concentration) x (conversion factors)
Baseline Actual H2SO4 Emissions	=	0.11	tons/yr	See 'H2SO4 S-H-L BAE' sheet.
Unused Baseline Capacity H_2SO_4 Emissions	=	0.04	tpy	= (Baseline Capacity H2SO4 Emissions) - (Baseline Actual H2SO4 Emissions)
Average Hourly H_2SO_4 Emissions	=	0.2	lb/day	= (Unused Baseline Capacity H2SO4 Emissions - T/yr) x (2,000 lb/T) / (Baseline Operating Hours Capacity) x (24 hr/day)

Vapor Pressure Data from Perry's 5th Edition; Table 3-14.

Temp. (°C)		pH_2SO_4 (mmHg)
204.0	@	5.9
218.5	@	9.8
234.5	@	14.7
249.0	@	28.5
261.0	@	38.8
273.0	@	61.9
285.0	@	91.6
295.0	@	132.3

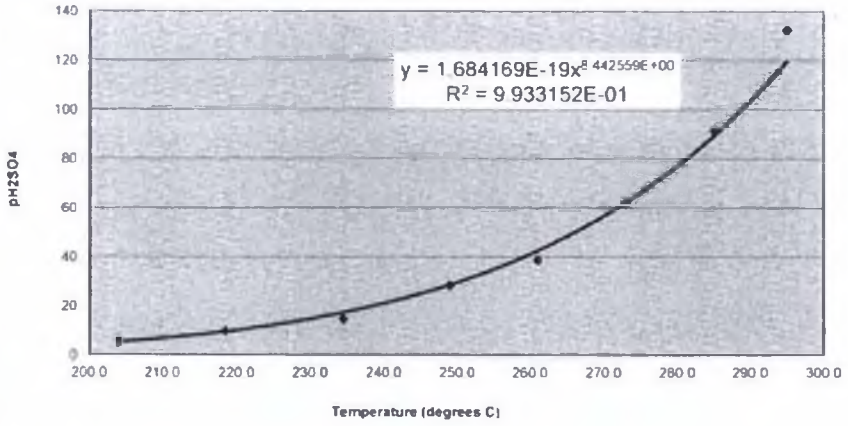


Projected Actual Emissions - H_2SO_4 Tanks, Handling & Loadout Operations

Parameter		Value	Units	Basis
Calculation Input Data				
Projected H2SO4 Production	=	235,000	tons/yr	Projected Acid Plant Production = (700 tons 100% H2SO4/day) x (336 days/year)
Number of Acid Storage Tanks (inc. Truck Filling)	=	5		
H2SO4 Liquid Density	=	15.0	lb/gal	
Tank Temperature	=	240	°F	Max. temp of acid in tanks
Tank Temperature	=	116	°C	Max. temp of acid in tanks
Projected Actual Operating Hours	=	8,064	hr/yr	= (336 days/yr) x (24 hr/day)
Calcuations				
Volume of Acid Produced	=	4,185,600	ft3	= (Projected H2SO4 Production) x (2,000 lb/ton) / (H2SO4 Liquid Density lb/gal) / (7.48 gal/ft3)
Maximum Vapor Displacement Rate	=	20,927,999	ft3	= (Volume of acid produced) x (Mumber of tanks)
H_2SO_4 Conc. in Displaced Vapor @ 100% saturation.	=	57.7	ppmv	Extrapolation of Perry's data, see figure below for equation
Projected Actual H_2SO_4 Emissions	=	0.15	tpy	= (Volume of vapor displaced) x (saturation concentration) x (conversion factors)
Projected Average Hourly H_2SO_4 Emissions	=	0.9	lb/day	= (Projected Actual H2SO4 Emissions - T/yr) x (2,000 lb/T) / (Projected Actual Operating Hours) x (24 hr/day)

Vapor Pressure Data from Perry's 5th Edition; Table 3-14.

Temp. (°C)		pH_2SO_4 (mmHg)
204.0	@	5.9
218.5	@	9.8
234.5	@	14.7
249.0	@	28.5
261.0	@	38.8
273.0	@	61.9
285.0	@	91.6
295.0	@	132.3

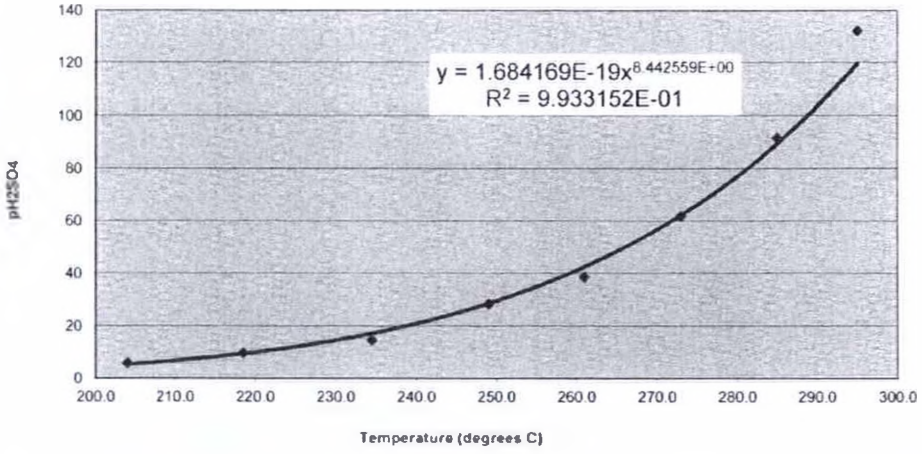


Potential Emissions - H_2SO_4 Tanks, Handling & Loadout Operations

Parameter		Value	Units	Basis
Calculation Input Data				
Potential H2SO4 Production	=	256,000	tons/yr	Potential Acid Plant capacity = (700 tons 100% H2SO4/day) x (365 days/year)
Number of Acid Storage Tanks (inc. Truck Filling)	=	5		
H2SO4 Liquid Density	=	15.0	lb/gal	
Tank Temperature	=	240	°F	Max. temp of acid in tanks.
Tank Temperature	=	116	°C	Max. temp of acid in tanks.
Potential Operating Hours	=	8,760	hr/yr	= (365 days/yr) x (24 hr/day)
Calcuations				
Volume of Acid Produced	=	4,559,632	ft3	= (Potential H2SO4 Production) x (2,000 lb/ton) / (H2SO4 Liquid Density lb/gal) / (7.48 gal/ft3)
Maximum Vapor Displacement Rate	=	22,798,161	ft3	= (Volume of acid produced) x (Mumber of tanks)
H_2SO_4 Conc. in Displaced Vapor @ 100% saturation.	=	57.7	ppmv	Extrapolation of Perry's data; see figure below for equation.
Potential H_2SO_4 Emissions	=	0.17	tpy	= (Volume of vapor displaced) x (saturation concentration) x (conversion factors)
Average Hourly H_2SO_4 Emissions	=	0.9	lb/day	= (Potential H2SO4 Emissions - T/yr) x (2,000 lb/T) / (Potential Operating Hours) x (24 hr/day)

Vapor Pressure Data from Perry's 5th Edition; Table 3-14.

Temp. (°C)		pH_2SO_4 (mmHg)
204.0	@	5.9
218.5	@	9.8
234.5	@	14.7
249.0	@	28.5
261.0	@	38.8
273.0	@	61.9
285.0	@	91.6
295.0	@	132.3



Baseline Actual Emissions - H2S from Sulfur Storage, Handling & Unloading Operations			
Parameter		**Value Units**	**Basis**
Calculation Input Data:			
Vp H2S @ 110 °C	=	0.001342 atm	Data from sulfur vendor (Vp H2S = 1.02 mmHg)
k_H @ 110 °C	=	0.002 ATM/ppmw	kH at approximate melting point (derived from Figure 1 below).
Sulfur Dissolved H2S Concentration	=	1 ppmw	= (Vp H2S @ 110 °C) / (kH @ 110 °C)
H2SO4 Rate	=	174,932 T/yr	Baseline actual 100% H2SO4 production.
Sulfur Feed Rate	=	58,311 T/yr	Estimate: based on 3 lb H2SO4 per lb S burned in furnace.
Sulfur Density	=	124.8 lb/ft3	Based on liquid sulfur SG = 2.0
Calculations:			
Volume of Sulfur Feed	=	934,467 ft3/yr	= (Sulfur Feed Rate) x (2,000 lb/T) / (Sulfur Density)
Baseline Actual H2S Emissions	=	0.06 T/yr	Assumes 100% of H2S in sulfur is emitted upstream of furnace.
H2S Vapor Pressure Data:			

Inorganic Polysulfanes H_2S_n with $n > 1$ 101

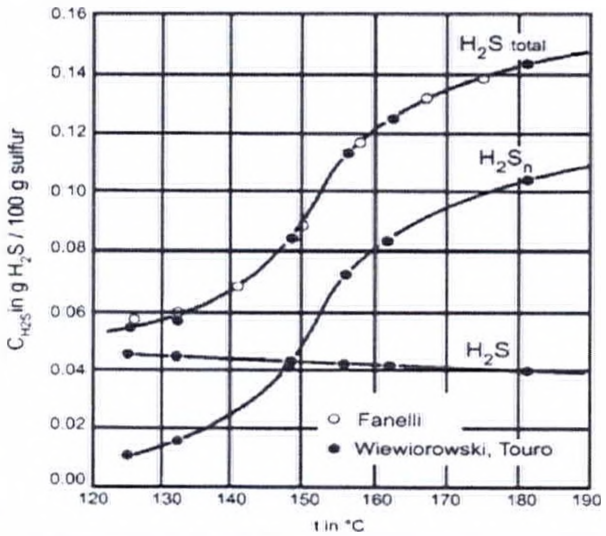


Fig. 1 Contribution of H_2S and H_2S_n to the total solubility of hydrogen sulfide (H_2S_{total}) in liquid sulfur as a function of temperature at $p(H_2S)=1.013$ bar (data from [8, 10])

Data Source:

Top Curr Chem (2003) 231: 99–125
DOI 10.1007/b13182

Inorganic Polysulfanes H_2S_n with $n > 1$

Ralf Steudel

Institut für Chemie, Sekr. C2, Technische Universität Berlin, 10623 Berlin, Germany
E-mail: steudel@schwefel.chem.tu-berlin.de

Unused Baseline Capacity Emissions - H2S from Sulfur Storage, Handling & Unloading Operations			
Parameter		**Value Units**	**Basis**
Calculation Input Data:			
Vp H2S @ 110 °C	=	0.001342 atm	Data from sulfur vendor (Vp H2S = 1.02 mmHg).
k_H @ 110 °C	=	0.002 ATM/ppmw	kH at approximate melting point (derived from Figure 1 below).
Sulfur Dissolved H2S Concentration	=	1 ppmw	= (Vp H2S @ 110 °C) / (kH @ 110 °C)
H2SO4 Rate	=	233,789 T/yr	Projected actual 100% H2SO4 production.
Sulfur Feed Rate	=	77,930 T/yr	Estimate: based on 3 lb H2SO4 per lb S burned in furnace.
Sulfur Density	=	124.8 lb/ft3	Based on liquid sulfur SG = 2.0
Calculations:			
Volume of Sulfur Feed	=	1,248,872 ft3/yr	= (Sulfur Feed Rate) x (2,000 lb/T) / (Sulfur Density)
Baseline Capacity H2S Emissions	=	0.08 T/yr	Assumes 100% of H2S in sulfur is emitted upstream of furnace.
Baseline Actual H2S Emissions	=	0.06 T/yr	See 'H2S BAE' sheet.
UBCE H2S Emissions	=	0.02 T/yr	= (Baseline Capacity H2S Emissions) - (Baseline Actual H2S Emissions)
H2S Vapor Pressure Data:			

Inorganic Polysulfanes H_2S_n with $n > 1$ 101

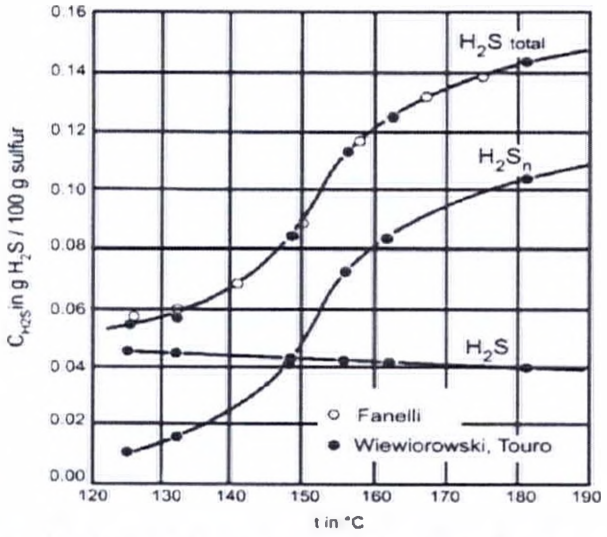


Fig. 1 Contribution of H_2S and H_2S_n to the total solubility of hydrogen sulfide (H_2S_{total}) in liquid sulfur as a function of temperature at $p(H_2S)=1.013$ bar (data from [8, 10])

Data Source:

Top Curr Chem [2003] 231:99–125
DOI 10.1007/b13182

Inorganic Polysulfanes H_2S_n with $n > 1$

Ralf Steudel

Institut für Chemie, Sekr. C2, Technische Universität Berlin, 10623 Berlin, Germany
E-mail: steudel@schwefel.chem.tu-berlin.de

Projected Actual Emissions - H2S from Sulfur Storage, Handling & Unloading Operations			
Parameter	**Value**	**Units**	**Basis**
Calculation Input Data:			
Vp H2S @ 110 °C	=	0.001342 atm	Data from sulfur vendor (Vp H2S = 1.02 mmHg).
k_H @ 110 °C	=	0.002 ATM/ppmw	kH at approximate melting point (derived from Figure 1 below).
Sulfur Dissolved H2S Concentration	=	1 ppmw	= (Vp H2S @ 110 °C) / (kH @ 110 °C)
H2SO4 Rate	=	235,000 T/yr	Projected actual 100% H2SO4 production.
Sulfur Feed Rate	=	78,333 T/yr	Estimate: based on 3 lb H2SO4 per lb S burned in furnace.
Sulfur Density	=	124.8 lb/ft3	Based on liquid sulfur SG = 2.0
Calculations:			
Volume of Sulfur Feed	=	1,255,342 ft3/yr	= (Sulfur Feed Rate) x (2,000 lb/T) / (Sulfur Density)
Projected Actual H2S Emissions	=	0.08 T/yr	Assumes 100% of H2S in sulfur is emitted upstream of furnace.
H2S Vapor Pressure Data:			

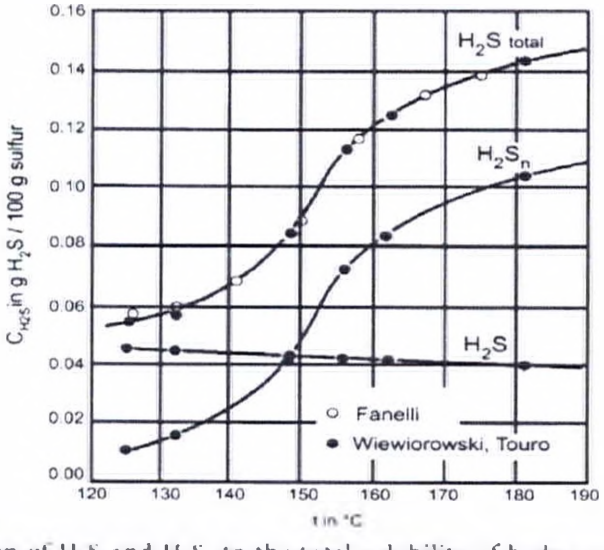


Fig. 1 Contribution of H_2S and H_2S_n to the total solubility of hydrogen sulfide (H_2S_{total}) in liquid sulfur as a function of temperature at $p(H_2S)=1.013$ bar (data from [8, 10])

Data Source:

Top Curr Chem (2003) 231:99–125
DOI 10.1007/b13582

Inorganic Polysulfanes H_2S_n with $n > 1$

Ralf Steudel

Institut für Chemie, Sekt. C2, Technische Universität Berlin, 10623 Berlin, Germany
E-mail: steudel@schwefel.chem.tu-berlin.de

Sulfur Furnace Igniter BAE & BE

Parameter		Value	Units	Source / Basis
Emission Unit(s) ID	=			**Sulfur Furnace Igniter Burner**
Fuel Burned	=	1.82	MMSCF/yr	Average annual amount of natural gas fired during baseline period.
Burner PM EF	=	1.9	lb/MMSCF	AP-42, Table 1.4-2, 7/98.
Burner PM10 EF	=	5.1	lb/MMSCF	Permit limit (based on a natural gas HHV of 1,020 Btu/SCF)
Burner PM2.5 EF	=	5.1	lb/MMSCF	PM10 permit limit (based on a natural gas HHV of 1,020 Btu/SCF)
Burner VOC EF	=	3.1	lb/MMSCF	PM10 permit limit (based on a natural gas HHV of 1,020 Btu/SCF)
Burner NOx EF	=	62	lb/MMSCF	Permit limit (based on a natural gas HHV of 1,020 Btu/SCF)
Burner SO2 EF	=	2.9	lb/MMSCF	Permit limit (based on a natural gas HHV of 1,020 Btu/SCF)
Burner CO EF	=	36	lb/MMSCF	Permit limit (based on a natural gas HHV of 1,020 Btu/SCF)
Burner CO2e EF	=	119,344	lb/MMSCF	CO2 + N2O x 310 + CH4 x 21 (40 CFR 98, Tables C-1 and C-2; NG HHV = 1,020 Btu/SCF).
Burner H2SO4 EF	=	0.05100	lb/MMSCF	Estimated at 1% of SO2 emissions (see AP-42, Table 1.1-3, Footnote B).
Burner Pb EF	=	0.000	lb/MMSCF	Not emitted.
Burner Fluoride EF	=	0.000	lb/MMSCF	Not emitted.
Annual Emissions Calculations				
PM Emissions	=	1.7E-03	tpy	= (Fuel Burned- MMSCF/yr) x (Burner PM EF) / (2,000 lb/ton)
PM10 Emissions	=	4.6E-03	tpy	= (Fuel Burned- MMSCF/yr) x (Burner PM10 EF) / (2,000 lb/ton)
PM2.5 Emissions	=	4.6E-03	tpy	= (Fuel Burned- MMSCF/yr) x (Burner PM2.5 EF) / (2,000 lb/ton)
VOC Emissions	=	2.8E-03	tpy	= (Fuel Burned- MMSCF/yr) x (Burner VOC EF) / (2,000 lb/ton)
NOx Emissions	=	5.6E-02	tpy	= (Fuel Burned- MMSCF/yr) x (Burner NOx EF) / (2,000 lb/ton)
SO2 Emissions	=	2.6E-03	tpy	= (Fuel Burned- MMSCF/yr) x (Burner SO2 EF) / (2,000 lb/ton)
CO Emissions	=	3.3E-02	tpy	= (Fuel Burned- MMSCF/yr) x (Burner CO EF) / (2,000 lb/ton)
CO2e Emissions	=	109	tpy	= (Fuel Burned- MMSCF/yr) x (Burner CO2e EF) / (2,000 lb/ton)
H2SO4 Emissions	=	4.6E-05	tpy	= (Fuel Burned- MMSCF/yr) x (Burner H2SO4 EF) / (2,000 lb/ton)
Pb Emissions	=	0.0E+00	tpy	= (Fuel Burned- MMSCF/yr) x (Burner Pb EF) / (2,000 lb/ton)
Fluoride Emissions	=	0.0E+00	tpy	= (Fuel Burned- MMSCF/yr) x (Burner Fluoride EF) / (2,000 lb/ton)

Summary of Results

		Sulfur Furnace Baseline Actual Emissions (tons per year)										
Pollutant	=	PM	PM10	PM2.5	VOC	NOx	SO2	CO	CO2e	H2SO4	Pb	Fluorides
Mass Rate (TPY)	=	0.00	0.00	0.00	0.00	0.06	0.00	0.03	109	0.00	0.00	0.00

Sulfur Furnace Igniter UBCE

Parameter		Value	Units	Source / Basis
Emission Unit(s) ID	=			***Sulfur Furnace Igniter Burner***
Fuel Burned	=	2.5	MMSCF/yr	Projected actual future firing rate = maximum value from previous 10 years; project will not increase rate.
Burner PM EF	=	1.9	lb/MMSCF	AP-42, Table 1.4-2, 7/98.
Burner PM10 EF	=	5.1	lb/MMSCF	Permit limit (based on a natural gas HHV of 1,020 Btu/SCF)
Burner PM2.5 EF	=	5.1	lb/MMSCF	PM10 permit limit (based on a natural gas HHV of 1,020 Btu/SCF)
Burner VOC EF	=	3.1	lb/MMSCF	PM10 permit limit (based on a natural gas HHV of 1,020 Btu/SCF)
Burner NOx EF	=	62	lb/MMSCF	Permit limit (based on a natural gas HHV of 1,020 Btu/SCF)
Burner SO2 EF	=	2.9	lb/MMSCF	Permit limit (based on a natural gas HHV of 1,020 Btu/SCF)
Burner CO EF	=	36	lb/MMSCF	Permit limit (based on a natural gas HHV of 1,020 Btu/SCF)
Burner CO2e EF	=	119,344	lb/MMSCF	CO2 + N2O x 310 + CH4 x 21 (40 CFR 98, Tables C-1 and C-2; NG HHV = 1,020 Btu/SCF).
Burner H2SO4 EF	=	0.05100	lb/MMSCF	Estimated at 1% of SO2 emissions (see AP-42, Table 1.1-3, Footnote B).
Burner Pb EF	=	0.000	lb/MMSCF	Not emitted.
Burner Fluoride EF	=	0.000	lb/MMSCF	Not emitted.
Annual Emissions Calculations				
PM Emissions	=	0.00	tpy	= (Fuel Burned- MMSCF/yr) x (Burner PM EF) / (2000 lb/ton)
PM10 Emissions	=	0.01	tpy	= (Fuel Burned- MMSCF/yr) x (Burner PM10 EF) / (2000 lb/ton)
PM2.5 Emissions	=	0.01	tpy	= (Fuel Burned- MMSCF/yr) x (Burner PM2.5 EF) / (2000 lb/ton)
VOC Emissions	=	0.00	tpy	= (Fuel Burned- MMSCF/yr) x (Burner VOC EF) / (2000 lb/ton)
NOx Emissions	=	0.08	tpy	= (Fuel Burned- MMSCF/yr) x (Burner NOx EF) / (2000 lb/ton)
SO2 Emissions	=	0.00	tpy	= (Fuel Burned- MMSCF/yr) x (Burner SO2 EF) / (2000 lb/ton)
CO Emissions	=	0.04	tpy	= (Fuel Burned- MMSCF/yr) x (Burner CO EF) / (2000 lb/ton)
CO2e Emissions	=	149	tpy	= (Fuel Burned- MMSCF/yr) x (Burner CO2e EF) / (2000 lb/ton)
H2SO4 Emissions	=	0.00	tpy	= (Fuel Burned- MMSCF/yr) x (Burner H2SO4 EF) / (2000 lb/ton)
Pb Emissions	=	0.00	tpy	= (Fuel Burned- MMSCF/yr) x (Burner Pb EF) / (2000 lb/ton)
Fluoride Emissions	=	0.00	tpy	= (Fuel Burned- MMSCF/yr) x (Burner Fluoride EF) / (2000 lb/ton)

Summary of Results

		Sulfur Furnace Unused Baseline Capacity Emissions (tons per year)										
Pollutant	=	PM	PM10	PM2.5	VOC	NOx	SO2	CO	CO2e	H2SO4	Pb	Fluorides
Baseline Emissions Capability	=	0.00	0.01	0.01	0.00	0.08	0.00	0.04	149	0.00	0.00	0.00
BAE	=	0.00	0.00	0.00	0.00	0.06	0.00	0.03	109	0.00	0.00	0.00
UCBE	=	0.00	0.00	0.00	0.00	0.02	0.00	0.01	41	0.00	0.00	0.00

Sulfur Furnace Igniter PAE

Parameter		Value	Units	Source / Basis
Emission Unit(s) ID	=			**Sulfur Furnace Igniter Burner**
Fuel Burned	=	2.5	MMSCF/yr	Projected actual future firing rate = maximum value from previous 10 years.
Burner PM EF	=	1.9	lb/MMSCF	AP-42, Table 1.4-2, 7/98.
Burner PM10 EF	=	5.1	lb/MMSCF	Permit limit (based on a natural gas HHV of 1,020 Btu/SCF)
Burner PM2.5 EF	=	5.1	lb/MMSCF	PM10 permit limit (based on a natural gas HHV of 1,020 Btu/SCF)
Burner VOC EF	=	3.1	lb/MMSCF	PM10 permit limit (based on a natural gas HHV of 1,020 Btu/SCF)
Burner NOx EF	=	62	lb/MMSCF	Permit limit (based on a natural gas HHV of 1,020 Btu/SCF)
Burner SO2 EF	=	2.9	lb/MMSCF	Permit limit (based on a natural gas HHV of 1,020 Btu/SCF)
Burner CO EF	=	36	lb/MMSCF	Permit limit (based on a natural gas HHV of 1,020 Btu/SCF)
Burner CO2e EF	=	119,344	lb/MMSCF	CO2 + N2O x 310 + CH4 x 21 (40 CFR 98, Tables C-1 and C-2; NG HHV = 1,020 Btu/SCF).
Burner H2SO4 EF	=	0.05100	lb/MMSCF	Estimated at 1% of SO2 emissions (see AP-42, Table 1.1-3, Footnote B).
Burner Pb EF	=	0.000	lb/MMSCF	Not emitted.
Burner Fluoride EF	=	0.000	lb/MMSCF	Not emitted.
Annual Emissions Calculations				
PM Emissions	=	0.00	tpy	= (Fuel Burned- MMSCF/yr) x (Burner PM EF) / (2000 lb/ton)
PM10 Emissions	=	0.01	tpy	= (Fuel Burned- MMSCF/yr) x (Burner PM10 EF) / (2000 lb/ton)
PM2.5 Emissions	=	0.01	tpy	= (Fuel Burned- MMSCF/yr) x (Burner PM2.5 EF) / (2000 lb/ton)
VOC Emissions	=	0.00	tpy	= (Fuel Burned- MMSCF/yr) x (Burner VOC EF) / (2000 lb/ton)
NOx Emissions	=	0.08	tpy	= (Fuel Burned- MMSCF/yr) x (Burner NOx EF) / (2000 lb/ton)
SO2 Emissions	=	0.00	tpy	= (Fuel Burned- MMSCF/yr) x (Burner SO2 EF) / (2000 lb/ton)
CO Emissions	=	0.04	tpy	= (Fuel Burned- MMSCF/yr) x (Burner CO EF) / (2000 lb/ton)
CO2e Emissions	=	149	tpy	= (Fuel Burned- MMSCF/yr) x (Burner CO2e EF) / (2000 lb/ton)
H2SO4 Emissions	=	0.00	tpy	= (Fuel Burned- MMSCF/yr) x (Burner H2SO4 EF) / (2000 lb/ton)
Pb Emissions	=	0.00	tpy	= (Fuel Burned- MMSCF/yr) x (Burner Pb EF) / (2000 lb/ton)
Fluoride Emissions	=	0.00	tpy	= (Fuel Burned- MMSCF/yr) x (Burner Fluoride EF) / (2000 lb/ton)

Summary of Results

		Sulfur Furnace Baseline Actual Emissions (tons per year)										
Pollutant	=	PM	PM10	PM2.5	VOC	NOx	SO2	CO	CO2e	H2SO4	Pb	Fluorides
Mass Rate (TPY)	=	0.00	0.01	0.01	0.00	0.08	0.00	0.04	149	0.00	0.00	0.00

Sulfur Furnace Igniter PTE

Parameter		Value	Units	Source / Basis
Emission Unit(s) ID	=			***Sulfur Furnace Igniter Burner***
Fuel Burned	=	21.0	MMSCF/yr	Permit Limit
Burner PM EF	=	1.9	lb/MMSCF	AP-42, Table 1.4-2, 7/98.
Burner PM10 EF	=	5.1	lb/MMSCF	Permit limit (based on a natural gas HHV of 1,020 Btu/SCF)
Burner PM2.5 EF	=	5.1	lb/MMSCF	PM10 permit limit (based on a natural gas HHV of 1,020 Btu/SCF)
Burner VOC EF	=	3.1	lb/MMSCF	PM10 permit limit (based on a natural gas HHV of 1,020 Btu/SCF)
Burner NOx EF	=	62	lb/MMSCF	Permit limit (based on a natural gas HHV of 1,020 Btu/SCF)
Burner SO2 EF	=	2.9	lb/MMSCF	Permit limit (based on a natural gas HHV of 1,020 Btu/SCF)
Burner CO EF	=	36	lb/MMSCF	Permit limit (based on a natural gas HHV of 1,020 Btu/SCF)
Burner CO2e EF	=	119,344	lb/MMSCF	CO2 + N2O x 310 + CH4 x 21 (40 CFR 98, Tables C-1 and C-2; NG HHV = 1,020 Btu/SCF).
Burner H2SO4 EF	=	0.05100	lb/MMSCF	Estimated at 1% of SO2 emissions (see AP-42, Table 1.1-3, Footnote B).
Burner Pb EF	=	0.000	lb/MMSCF	Not emitted.
Burner Fluoride EF	=	0.000	lb/MMSCF	Not emitted.
Annual Emissions Calculations				
PM Emissions	=	0.02	tpy	= (Fuel Burned- MMSCF/yr) x (Burner PM EF) / (2000 lb/ton)
PM10 Emissions	=	0.05	tpy	= (Fuel Burned- MMSCF/yr) x (Burner PM10 EF) / (2000 lb/ton)
PM2.5 Emissions	=	0.05	tpy	= (Fuel Burned- MMSCF/yr) x (Burner PM2.5 EF) / (2000 lb/ton)
VOC Emissions	=	0.03	tpy	= (Fuel Burned- MMSCF/yr) x (Burner VOC EF) / (2000 lb/ton)
NOx Emissions	=	0.65	tpy	= (Fuel Burned- MMSCF/yr) x (Burner NOx EF) / (2000 lb/ton)
SO2 Emissions	=	0.03	tpy	= (Fuel Burned- MMSCF/yr) x (Burner SO2 EF) / (2000 lb/ton)
CO Emissions	=	0.37	tpy	= (Fuel Burned- MMSCF/yr) x (Burner CO EF) / (2000 lb/ton)
CO2e Emissions	=	1,253	tpy	= (Fuel Burned- MMSCF/yr) x (Burner CO2e EF) / (2000 lb/ton)
H2SO4 Emissions	=	0.00	tpy	= (Fuel Burned- MMSCF/yr) x (Burner H2SO4 EF) / (2000 lb/ton)
Pb Emissions	=	0.00	tpy	= (Fuel Burned- MMSCF/yr) x (Burner Pb EF) / (2000 lb/ton)
Fluoride Emissions	=	0.00	tpy	= (Fuel Burned- MMSCF/yr) x (Burner Fluoride EF) / (2000 lb/ton)

Summary of Results

		Sulfur Furnace Baseline Actual Emissions (tons per year)										
Pollutant	=	PM	PM10	PM2.5	VOC	NOx	SO2	CO	CO2e	H2SO4	Pb	Fluorides
Mass Rate (TPY)	=	0.02	0.05	0.05	0.03	0.65	0.03	0.37	1,253	0.00	0.00	0.00

Constants

Parameter		Value	Units	Notes / Basis
PM10-to-H2SO4 EF Ratio	=	110%	wt. %	Estimate based on test data from Don Plant?
Projected Avoided Downtime	=	0.6%	% of max	Simplot projection of reduced downtime due to project.
Post-Project SO2 Emissions Factor	=	1.7	lb/T	
GHGm & CO2e Emissions Factor	=	0.268	lb/T	AP42 Background Sec. 8.10 (12/92); upper CI95 of emissiosn data rated A or B. from sulfur burning plants
Acid Plant Production Capacity	=	700	T/day	Plant design basis.
Projected Operating Days	=	336	days/yr	Based on 3-week annual turnaround & 2.3% unscheduled downtime.
Potential Operating Days	=	365	days/yr	Assumes no downtime needed.
Baseline Actual Operating Hours	=	7,896	hr/yr	From acid plant downtime report - average for baseline period.
"Normal" Temperature	=	32	°F	to convert Nm3 to SCF
"Standard" Temperature	=	68	°F	to convert SCF to Nm3
Standard Atm Press.	=	29.92	in Hg	
ft3 per m3	=	35.31	ft3/m3	
SCF per lb-mole	=	385.57	ft3/lb-mol	@ 68 F
Gas Law Constant	=	10.732	$(ft^3 \cdot psi)/(°R \cdot lb\text{-}mol)$	
SCF per Nm3	=	746.9	SCF/Nm3	
H2SO4 Liquid Density	=	15.0	lb/gal	
Natural Gas HHV	=	1,020	Btu/SCF	Assumed per permit.

Lathrop H2SO4 Test Data

Date	H2SO4 (lb/T)
11/15/2004	0.028
6/1/2005	0.024
6/13/2006	0.053
6/13/2007	0.038
5/23/2008	0.033
5/20/2009	0.104
5/20/2010	0.090
5/24/2011	0.093
5/15/2012	0.154
Average =	0.0686
Std. Dev. =	0.0443
No. of Tests =	9
99th%tile =	0.1715
UCl95 (NORM) =	0.0975

NOx Test Data

Year	RS Lurgi	RS MEC	Don #400	Don #300
	NOx Emissions (lb/T)			
2001				0.053
2002				0.065
2003	0.06	0.14		0.064
2004	0.14	0.14		0.067
2005	0.14	0.14	0.081	0.066
2006	0.06	0.07	0.086	0.066
2007	0.04	0.08	0.097	0.069
2008	0.03	0.10	0.096	0.056
2009	0.03	0.09	0.088	0.057
2010	0.06	0.06	0.077	0.058
2011	0.06	0.06	0.097	0.060
2012	0.12	0.14	0.105	0.057
Number of Data Points =	10	10	8	12
Average =	0.074	0.102	0.091	0.061
Standard Deviation =	0.043	0.035	0.010	0.005
99th percentile =	0.174	0.183	0.113	0.074
UCI95 =	0.101	0.124	0.098	0.064

Overall Average =	0.081
Overall Std. Dev. =	0.032
Overall Count =	40
Overall UCI95 =	0.091
Overall 99th%ile =	0.154

Startup Heater Gas Use

Date	Raw Use (Mscf)	Adj. Use (Mscf)	12-M Use (Mscf)
Jan-2003	0	0	
Feb-2003	0	0	
Mar-2003	0	0	
Apr-2003	0	0	
May-2003	0	0	
Jun-2003	0	0	
Jul-2003	0	0	
Aug-2003	0	0	
Sep-2003	921	921	
Oct-2003	5	5	
Nov-2003	0	0	
Dec-2003	0	0	926
Jan-2004	0	0	926
Feb-2004	683	683	1,609
Mar-2004	0	0	1,609
Apr-2004	886	886	2,495
May-2004	0	0	2,495
Jun-2004	0	0	2,495
Jul-2004	0	0	2,495
Aug-2004	0	0	2,495
Sep-2004	0	0	1,574
Oct-2004	0	0	1,569
Nov-2004	812	812	2,382
Dec-2004	0	0	2,382
Jan-2005	0	0	2,382
Feb-2005	777	777	2,476
Mar-2005	0	0	2,476
Apr-2005	0	0	1,590
May-2005	0	0	1,590
Jun-2005	0	0	1,590
Jul-2005	0	0	1,590
Aug-2005	0	0	1,590
Sep-2005	0	0	1,590
Oct-2005	792	792	2,382
Nov-2005	0	0	1,569
Dec-2005	0	0	1,569
Jan-2006	0	0	1,569
Feb-2006	0	0	792
Mar-2006	0	0	792
Apr-2006	0	0	792

Startup Heater Gas Use

May-2006	0	0	792
Jun-2006	0	0	792
Jul-2006	0	0	792
Aug-2006	0	0	792
Sep-2006	1,396	1,396	2,188
Oct-2006	0	0	1,396
Nov-2006	0	0	1,396
Dec-2006	0	0	1,396
Jan-2007	0	0	1,396
Feb-2007	0	0	1,396
Mar-2007	0	0	1,396
Apr-2007	0	0	1,396
May-2007	0	0	1,396
Jun-2007	-495	0	1,396
Jul-2007	0	0	1,396
Aug-2007	0	0	1,396
Sep-2007	0	0	0
Oct-2007	1,139	1,139	1,139
Nov-2007	0	0	1,139
Dec-2007	0	0	1,139
Jan-2008	347	347	1,485
Feb-2008	0	0	1,485
Mar-2008	0	0	1,485
Apr-2008	0	0	1,485
May-2008	693	693	2,178
Jun-2008	0	0	2,178
Jul-2008	0	0	2,178
Aug-2008	0	0	2,178
Sep-2008	0	0	2,178
Oct-2008	0	0	1,040
Nov-2008	0	0	1,040
Dec-2008	0	0	1,040
Jan-2009	0	0	693
Feb-2009	0	0	693
Mar-2009	0	0	693
Apr-2009	0	0	693
May-2009	0	0	0
Jun-2009	0	0	0
Jul-2009	0	0	0
Aug-2009	0	0	0
Sep-2009	0	0	0
Oct-2009	1,238	1,238	1,238
Nov-2009	0	0	1,238

Startup Heater Gas Use

Dec-2009	0	0	1,238
Jan-2010	0	0	1,238
Feb-2010	0	0	1,238
Mar-2010	0	0	1,238
Apr-2010	0	0	1,238
May-2010	0	0	1,238
Jun-2010	0	0	1,238
Jul-2010	0	0	1,238
Aug-2010	0	0	1,238
Sep-2010			
Oct-2010			
Nov-2010			
Dec-2010			
Jan-2011	0	0	
Feb-2011	0	0	
Mar-2011	0	0	
Apr-2011	0	0	
May-2011	-1	0	
Jun-2011	0	0	
Jul-2011	0	0	
Aug-2011	0	0	
Sep-2011	0	0	
Oct-2011	1,185	1,185	
Nov-2011	0	0	
Dec-2011	0	0	1,185
Jan-2012	0	0	1,185
Feb-2012	0	0	1,185
Mar-2012	0	0	1,185
Apr-2012	0	0	1,185
May-2012	0	0	1,185
Jun-2012	445	445	1,630
Jul-2012	0	0	1,630
Aug-2012	0	0	1,630
Sep-2012	0	0	1,630
Oct-2012	1,252	1,252	1,697
Nov-2012	0	0	1,697
Dec-2012	754	754	2,451
Jan-2013	0	0	2,451
Feb-2013	0	0	2,451
Mar-2013	11	11	2,462

0

0

1,185 Mscf

0

445 Mscf

0

2006 Mscf

11 Mscf

Adjusted Daily Values

Date	Raw 15-min SO2 Avg	Adj. 15-min SO2 Avg	Raw 3-hr SO2 Avg	Adj. 3-hr SO2 Avg	Raw ppmv SO2 Avg	Adj. ppmv SO2 Avg	Raw Daily Rate (SO2 lb/day)	Adj. Daily Rate (SO2 lb/day)	Final Daily Rate (SO2 lb/day)
04/01/2011	3.04	3.04	3.04	3.04	272	272	1,377	1,377	1,377
04/02/2011	3.03	3.03	3.03	3.03	274	274	1,404	1,404	1,404
04/03/2011	3.10	3.10	3.09	3.09	284	284	1,443	1,443	1,443
04/04/2011	3.19	3.19	3.18	3.18	294	294	1,466	1,466	1,466
04/05/2011	2.98	3.01	2.98	2.98	274	274	1,511	1,511	1,511
04/06/2011	3.05	3.05	3.06	3.06	279	279	1,469	1,469	1,469
04/07/2011	2.95	2.95	2.95	2.95	266	266	1,457	1,457	1,457
04/08/2011	3.00	3.00	2.99	2.99	273	273	1,467	1,467	1,467
04/09/2011	2.96	2.96	2.97	2.97	266	266	1,557	1,557	1,557
04/10/2011	2.94	2.94	2.93	2.93	264	264	1,610	1,610	1,610
04/11/2011	3.11	3.11	3.09	3.09	284	284	1,663	1,663	1,663
04/12/2011	3.10	3.10	3.10	3.10	282	282	1,842	1,842	1,842
04/13/2011	3.04	3.04	3.04	3.04	274	274	1,861	1,861	1,861
04/14/2011	3.03	3.03	3.02	3.02	273	273	1,824	1,824	1,824
04/15/2011	3.11	3.11	3.11	3.11	283	283	1,817	1,817	1,817
04/16/2011	3.26	3.26	3.01	3.01	280	280	1,868	1,868	1,868
04/17/2011	3.25	3.25	3.25	3.25	296	296	1,265	1,265	1,265
04/18/2011	3.12	3.12	3.14	3.14	279	279	1,985	1,985	1,985
04/19/2011	3.41	3.41	3.41	3.41	313	313	1,419	1,419	1,419
04/20/2011	3.23	3.23	3.23	3.23	293	293	2,061	2,061	2,061
04/21/2011	3.13	3.13	3.11	3.11	279	279	1,956	1,956	1,956
04/22/2011	3.28	3.28	3.28	3.28	297	297	1,905	1,905	1,905
04/23/2011	3.29	3.29	3.29	3.29	298	298	2,024	2,024	2,024
04/24/2011	3.27	3.27	3.26	3.26	295	295	2,027	2,027	2,027
04/25/2011	3.29	3.29	3.28	3.28	298	298	1,988	1,988	1,988
04/26/2011	3.35	3.35	3.35	3.35	307	307	1,994	1,994	1,994
04/27/2011	3.30	3.30	3.30	3.30	301	301	2,031	2,031	2,031
04/28/2011	12.91	6.35	14.24	3.63	236	236	1,842	1,842	470
04/29/2011	3.38	3.38	3.37	3.37	310	310	862	862	862
04/30/2011	3.40	3.40	3.41	3.41	312	312	2,047	2,047	2,047
05/01/2011	3.27	3.27	3.26	3.26	299	299	2,081	2,081	2,081
05/02/2011	3.34	3.34	3.33	3.33	307	307	2,022	2,022	2,022
05/03/2011	3.32	3.33	3.32	3.31	292	293	2,129	2,129	2,124
05/04/2011	3.30	3.30	3.30	3.30	303	303	2,039	2,039	2,039
05/05/2011	3.25	3.25	3.27	3.27	296	296	2,121	2,121	2,121
05/06/2011	3.24	3.24	3.23	3.23	292	292	2,090	2,090	2,090
05/07/2011	3.37	3.37	3.37	3.37	307	307	2,093	2,093	2,093
05/08/2011	3.35	3.35	3.34	3.34	305	305	2,172	2,172	2,172
05/09/2011	3.36	3.36	3.35	3.35	305	305	2,155	2,155	2,155
05/10/2011	3.33	3.33	3.33	3.33	302	302	2,159	2,159	2,159
05/11/2011	3.38	3.38	3.38	3.38	308	308	2,139	2,139	2,139
05/12/2011	3.37	3.37	3.36	3.36	306	306	2,167	2,167	2,167
05/13/2011	3.39	3.39	3.38	3.38	309	309	2,224	2,224	2,224
05/14/2011	3.40	3.40	3.40	3.40	309	309	2,278	2,278	2,278
05/15/2011	3.43	3.43	3.43	3.43	310	310	2,288	2,288	2,288
05/16/2011	3.45	3.45	3.44	3.44	313	313	2,295	2,295	2,295
05/17/2011	3.51	3.51	3.51	3.51	320	320	2,312	2,312	2,312
05/18/2011	3.50	3.50	3.51	3.51	321	321	2,361	2,361	2,361
05/19/2011	3.43	3.43	3.43	3.43	313	313	2,348	2,348	2,348
05/20/2011	3.40	3.40	3.40	3.40	310	310	2,295	2,295	2,295
05/21/2011	3.40	3.40	3.40	3.40	309	309	2,272	2,272	2,272
05/22/2011	3.41	3.41	3.40	3.40	309	309	2,275	2,275	2,275
05/23/2011	3.45	3.45	3.44	3.44	313	313	2,277	2,277	2,277
05/24/2011	3.37	3.37	3.37	3.37	303	303	2,302	2,302	2,302
05/25/2011	3.41	3.41	3.40	3.40	308	308	2,266	2,266	2,266
05/26/2011	3.39	3.39	3.39	3.39	307	307	2,296	2,296	2,296
05/27/2011	3.43	3.43	3.43	3.43	313	313	2,278	2,278	2,278
05/28/2011	3.43	3.43	3.42	3.42	312	312	2,309	2,309	2,309
05/29/2011	3.46	3.46	3.46	3.46	315	315	2,311	2,311	2,311
05/30/2011	3.44	3.44	3.43	3.43	312	312	2,339	2,339	2,339
05/31/2011	3.41	3.41	3.41	3.41	308	308	2,314	2,314	2,314
06/01/2011	3.33	3.33	3.33	3.33	298	298	2,296	2,296	2,296

Adjusted Daily Values

Date	Raw 15-min SO2 Avg	Adj. 15-min SO2 Avg	Raw 3-hr SO2 Avg	Adj. 3-hr SO2 Avg	Raw ppmv SO2 Avg	Adj. ppmv SO2 Avg	Raw Daily Rate (SO2 lb/day)	Adj. Daily Rate (SO2 lb/day)	Final Daily Rate (SO2 lb/day)
06/02/2011	4.56	4.56	3.89	3.50	355	355	2,237	2,237	2,013
06/03/2011	3.36	3.36	3.35	3.35	302	302	1,366	1,366	1,366
06/04/2011	3.46	3.46	3.45	3.45	316	316	2,249	2,249	2,249
06/05/2011	3.35	3.35	3.35	3.35	303	303	2,342	2,342	2,342
06/06/2011	3.43	3.43	3.43	3.43	313	313	2,259	2,259	2,259
06/07/2011	3.22	3.27	3.30	3.30	301	301	2,311	2,311	2,311
06/08/2011	3.39	3.39	3.39	3.39	310	310	2,229	2,229	2,229
06/09/2011	3.42	3.42	3.43	3.43	312	312	2,289	2,289	2,289
06/10/2011	3.26	3.26	3.24	3.24	296	296	2,278	2,278	2,278
06/11/2011	3.47	3.47	3.46	3.46	317	317	2,124	2,124	2,124
06/12/2011	3.51	3.51	3.51	3.51	321	321	2,351	2,351	2,351
06/13/2011	3.45	3.45	3.45	3.45	314	314	2,372	2,372	2,372
06/14/2011	3.45	3.45	3.45	3.45	314	314	2,335	2,335	2,335
06/15/2011	3.37	3.37	3.37	3.37	306	306	2,338	2,338	2,338
06/16/2011	3.32	3.32	3.32	3.32	299	299	2,284	2,284	2,284
06/17/2011	3.36	3.36	3.35	3.35	303	303	2,267	2,267	2,267
06/18/2011	3.39	3.39	3.39	3.39	305	305	2,299	2,299	2,299
06/19/2011	3.37	3.37	3.37	3.37	304	304	2,307	2,307	2,307
06/20/2011	3.40	3.40	3.39	3.39	307	307	2,297	2,297	2,297
06/21/2011	3.43	3.43	3.44	3.44	311	311	2,307	2,307	2,307
06/22/2011	3.41	3.41	3.40	3.40	308	308	2,330	2,330	2,330
06/23/2011	3.42	3.42	3.42	3.42	308	308	2,316	2,316	2,316
06/24/2011	3.41	3.41	3.40	3.40	306	306	2,334	2,334	2,334
06/25/2011	3.43	3.43	3.42	3.42	308	308	2,324	2,324	2,324
06/26/2011	3.44	3.44	3.43	3.43	310	310	2,336	2,336	2,336
06/27/2011	3.44	3.44	3.44	3.44	310	310	2,338	2,338	2,338
06/28/2011	3.47	3.47	3.47	3.47	312	312	2,343	2,343	2,343
06/29/2011	3.41	3.41	3.40	3.40	305	305	2,360	2,360	2,360
06/30/2011	3.43	3.43	3.45	3.45	311	311	2,324	2,324	2,324
07/01/2011	3.35	3.35	3.35	3.35	305	305	2,341	2,341	2,341
07/02/2011	3.44	3.44	3.44	3.44	315	315	2,285	2,285	2,285
07/03/2011	3.38	3.38	3.38	3.38	307	307	2,345	2,345	2,345
07/04/2011	3.42	3.42	3.42	3.42	312	312	2,285	2,285	2,285
07/05/2011	3.37	3.37	3.36	3.36	308	308	2,325	2,325	2,325
07/06/2011	3.34	3.34	3.34	3.34	304	304	2,293	2,293	2,293
07/07/2011	3.40	3.40	3.40	3.40	310	310	2,269	2,269	2,269
07/08/2011	3.36	3.36	3.36	3.36	305	305	2,320	2,320	2,320
07/09/2011	3.35	3.35	3.35	3.35	303	303	2,276	2,276	2,276
07/10/2011	3.31	3.31	3.31	3.31	298	298	2,282	2,282	2,282
07/11/2011	3.40	3.40	3.39	3.39	302	302	2,253	2,253	2,253
07/12/2011	3.38	3.38	3.38	3.38	306	306	2,294	2,294	2,294
07/13/2011	3.42	3.42	3.42	3.42	309	309	2,317	2,317	2,317
07/14/2011	3.37	3.37	3.37	3.37	303	303	2,344	2,344	2,344
07/15/2011	3.38	3.38	3.38	3.38	306	306	2,304	2,304	2,304
07/16/2011	3.41	3.41	3.41	3.41	309	309	2,321	2,321	2,321
07/17/2011	3.38	3.38	3.38	3.38	307	307	2,333	2,333	2,333
07/18/2011	3.36	3.36	3.36	3.36	304	304	2,309	2,309	2,309
07/19/2011	3.32	3.32	3.32	3.32	301	301	2,289	2,289	2,289
07/20/2011	3.33	3.33	3.33	3.33	303	303	2,256	2,256	2,256
07/21/2011	3.32	3.32	3.32	3.32	305	305	2,262	2,262	2,262
07/22/2011	3.36	3.36	3.35	3.35	311	311	2,276	2,276	2,276
07/23/2011	74.35	5.77	72.23	3.38	541	456	0	0	0
07/24/2011	2.81	2.81	2.80	2.80	254	254	1,037	1,037	1,037
07/25/2011	2.77	2.77	2.77	2.77	251	251	1,847	1,847	1,847
07/26/2011	2.84	2.84	2.84	2.84	259	259	1,824	1,824	1,824
07/27/2011	2.79	2.79	2.79	2.79	254	254	1,902	1,902	1,902
07/28/2011	2.71	2.71	2.72	2.72	246	246	1,887	1,887	1,887
07/29/2011	2.58	2.58	2.58	2.58	233	233	1,835	1,835	1,835
07/30/2011	2.41	2.41	2.41	2.41	218	218	1,743	1,743	1,743
07/31/2011	2.21	2.21	2.23	2.23	202	202	1,634	1,634	1,634
08/01/2011	1.81	1.81	1.84	1.84	165	165	1,512	1,512	1,512
08/02/2011	2.59	2.62	2.48	2.48	241	241	1,233	1,233	1,233

Adjusted Daily Values

Date	Raw 15-min SO2 Avg	Adj. 15-min SO2 Avg	Raw 3-hr SO2 Avg	Adj. 3-hr SO2 Avg	Raw ppmv SO2 Avg	Adj. ppmv SO2 Avg	Raw Daily Rate (SO2 lb/day)	Adj. Daily Rate (SO2 lb/day)	Final Daily Rate (SO2 lb/day)
08/03/2011	3.45	3.45	3.45	3.45	309	309	1,819	1,819	1,819
08/04/2011	3.30	3.30	3.30	3.30	297	297	2,334	2,334	2,334
08/05/2011	3.45	3.45	3.46	3.46	311	311	2,253	2,253	2,253
08/06/2011	3.45	3.45	3.45	3.45	311	311	2,342	2,342	2,342
08/07/2011	3.42	3.42	3.42	3.42	307	307	2,349	2,349	2,349
08/08/2011	3.45	3.45	3.45	3.45	310	310	2,324	2,324	2,324
08/09/2011	3.58	3.58	3.39	3.34	314	314	2,334	2,334	2,297
08/10/2011	3.31	3.31	3.30	3.30	302	302	1,423	1,423	1,423
08/11/2011	3.29	3.29	3.29	3.29	299	299	2,160	2,160	2,160
08/12/2011	3.31	3.31	3.30	3.30	301	301	2,183	2,183	2,183
08/13/2011	3.21	3.21	3.22	3.22	291	291	2,191	2,191	2,191
08/14/2011	2.98	2.98	2.98	2.98	270	270	2,048	2,048	2,048
08/15/2011	2.95	2.95	2.95	2.95	267	267	1,409	1,409	1,409
08/16/2011	2.98	2.98	2.97	2.97	272	272	1,364	1,364	1,364
08/17/2011	3.08	3.08	3.09	3.09	284	284	1,383	1,383	1,383
08/18/2011	3.08	3.08	3.07	3.07	283	283	1,445	1,445	1,445
08/19/2011	3.02	3.02	3.01	3.01	276	276	1,373	1,373	1,373
08/20/2011	3.11	3.11	3.11	3.11	286	286	1,152	1,152	1,152
08/21/2011	3.07	3.07	3.08	3.08	280	280	1,179	1,179	1,179
08/22/2011	3.08	3.08	3.06	3.06	281	281	1,162	1,162	1,162
08/23/2011	3.14	3.14	3.15	3.15	288	288	1,157	1,157	1,157
08/24/2011	2.97	2.97	2.97	2.97	268	268	1,177	1,177	1,177
08/25/2011	3.04	3.04	3.03	3.03	280	280	1,171	1,171	1,171
08/26/2011	2.91	2.91	2.92	2.92	264	264	1,319	1,319	1,319
08/27/2011	2.91	2.91	2.90	2.90	263	263	1,280	1,280	1,280
08/28/2011	2.99	2.99	2.98	2.98	273	273	1,291	1,291	1,291
08/29/2011	2.97	2.97	2.98	2.98	271	271	1,341	1,341	1,341
08/30/2011	3.01	3.01	3.01	3.01	278	278	1,349	1,349	1,349
08/31/2011	2.98	2.98	2.98	2.98	272	272	1,437	1,437	1,437
09/01/2011	3.00	3.00	2.99	2.99	275	275	1,415	1,415	1,415
09/02/2011	3.00	3.00	3.00	3.00	277	277	1,420	1,420	1,420
09/03/2011	2.90	2.90	2.90	2.90	263	263	1,420	1,420	1,420
09/04/2011	2.88	2.88	2.88	2.88	261	261	1,317	1,317	1,317
09/05/2011	2.96	2.96	2.95	2.95	271	271	1,331	1,331	1,331
09/06/2011	2.88	2.88	2.96	2.95	256	256	1,380	1,380	1,375
09/07/2011	2.97	2.97	2.97	2.97	272	272	1,292	1,292	1,292
09/08/2011	3.01	3.01	3.00	3.00	274	274	1,496	1,496	1,496
09/09/2011	3.06	3.06	3.05	3.05	279	279	1,694	1,694	1,694
09/10/2011	3.10	3.10	3.10	3.10	281	281	1,755	1,755	1,755
09/11/2011	3.13	3.13	3.13	3.13	282	282	1,871	1,871	1,871
09/12/2011	3.16	3.16	3.15	3.15	285	285	1,915	1,915	1,915
09/13/2011	3.18	3.18	3.17	3.17	288	288	1,924	1,924	1,924
09/14/2011	3.10	3.10	3.10	3.10	281	281	1,936	1,936	1,936
09/15/2011	3.08	3.08	3.07	3.07	274	274	1,896	1,896	1,896
09/16/2011	3.24	3.24	3.23	3.23	291	291	1,950	1,950	1,950
09/17/2011	3.41	3.41	3.40	3.40	310	310	2,146	2,146	2,146
09/18/2011	3.40	3.40	3.40	3.40	309	309	2,317	2,317	2,317
09/19/2011	3.45	3.45	3.44	3.44	315	315	2,298	2,298	2,298
09/20/2011	3.41	3.41	3.40	3.40	311	311	2,336	2,336	2,336
09/21/2011	3.47	3.47	3.46	3.46	316	316	2,305	2,305	2,305
09/22/2011	3.41	3.41	3.41	3.41	310	310	2,341	2,341	2,341
09/23/2011	3.40	3.40	3.42	3.42	307	307	2,290	2,290	2,290
09/24/2011	0.00	0.00	0.00	0.00	0	0	0	0	0
09/25/2011	0.00	0.00	0.00	0.00	0	0	0	0	0
09/26/2011	0.00	0.00	0.00	0.00	0	0	0	0	0
09/27/2011	0.00	0.00	0.00	0.00	0	0	0	0	0
09/28/2011	0.00	0.00	0.00	0.00	0	0	0	0	0
09/29/2011	0.00	0.00	0.00	0.00	0	0	0	0	0
09/30/2011	0.00	0.00	0.00	0.00	0	0	0	0	0
10/01/2011	0.00	0.00	0.00	0.00	0	0	0	0	0
10/02/2011	0.00	0.00	0.00	0.00	0	0	0	0	0
10/03/2011	0.00	0.00	0.00	0.00	0	0	0	0	0

Adjusted Daily Values

Date	Raw 15-min SO2 Avg	Adj. 15-min SO2 Avg	Raw 3-hr SO2 Avg	Adj. 3-hr SO2 Avg	Raw ppmv SO2 Avg	Adj. ppmv SO2 Avg	Raw Daily Rate (SO2 lb/day)	Adj. Daily Rate (SO2 lb/day)	Final Daily Rate (SO2 lb/day)
10/04/2011	0.00	0.00	0.00	0.00	0	0	0	0	0
10/05/2011	0.00	0.00	0.00	0.00	0	0	0	0	0
10/06/2011	0.00	0.00	0.00	0.00	0	0	0	0	0
10/07/2011	0.00	0.00	0.00	0.00	0	0	0	0	0
10/08/2011	0.00	0.00	0.00	0.00	0	0	0	0	0
10/09/2011	0.00	0.00	0.00	0.00	0	0	0	0	0
10/10/2011	0.00	0.00	0.00	0.00	0	0	0	0	0
10/11/2011	0.00	0.00	0.00	0.00	0	0	0	0	0
10/12/2011	0.00	0.00	0.00	0.00	0	0	0	0	0
10/13/2011	0.00	0.00	0.00	0.00	0	0	0	0	0
10/14/2011	0.00	0.00	0.00	0.00	0	0	0	0	0
10/15/2011	0.00	0.00	0.00	0.00	0	0	0	0	0
10/16/2011	0.00	0.00	0.00	0.00	0	0	0	0	0
10/17/2011	0.00	0.00	0.00	0.00	0	0	0	0	0
10/18/2011	0.00	0.00	0.00	0.00	0	0	0	0	0
10/19/2011	0.00	0.00	0.00	0.00	0	0	0	0	0
10/20/2011	0.00	0.00	0.00	0.00	0	0	0	0	0
10/21/2011	0.00	0.00	0.00	0.00	0	0	0	0	0
10/22/2011	2.18	2.18	2.25	2.25	190	190	0	0	0
10/23/2011	5.78	3.28	5.82	2.27	171	171	563	563	220
10/24/2011	1.86	1.86	1.85	1.85	168	168	798	798	798
10/25/2011	1.87	1.87	1.88	1.88	168	168	868	868	868
10/26/2011	1.78	1.78	1.78	1.78	161	161	871	871	871
10/27/2011	1.62	1.62	1.64	1.64	146	146	869	869	869
10/28/2011	2.24	2.24	2.18	2.18	204	204	894	894	894
10/29/2011	5.33	3.08	5.32	2.65	235	235	1,454	1,454	724
10/30/2011	2.42	2.42	2.42	2.42	216	216	1,416	1,416	1,416
10/31/2011	4.52	3.28	2.42	2.42	214	214	1,318	1,318	955
11/01/2011	4.60	3.30	3.68	2.80	254	254	997	997	715
11/02/2011	2.44	2.44	2.45	2.45	219	219	1,464	1,464	1,464
11/03/2011	3.93	3.81	3.90	2.86	224	224	1,257	1,257	922
11/04/2011	2.74	2.74	2.74	2.74	254	254	1,273	1,273	1,273
11/05/2011	2.77	2.77	2.77	2.77	256	256	1,617	1,617	1,617
11/06/2011	2.78	2.78	2.78	2.78	258	258	1,642	1,642	1,642
11/07/2011	2.80	2.80	2.80	2.80	260	260	1,715	1,715	1,715
11/08/2011	2.75	2.75	2.76	2.76	254	254	1,684	1,684	1,684
11/09/2011	2.70	2.70	2.70	2.70	249	249	1,679	1,679	1,679
11/10/2011	2.70	2.70	2.70	2.70	248	248	1,582	1,582	1,582
11/11/2011	2.81	2.81	2.80	2.80	260	260	1,662	1,662	1,662
11/12/2011	2.92	2.92	2.92	2.92	273	273	1,806	1,806	1,806
11/13/2011	2.88	2.88	2.88	2.88	267	267	1,944	1,944	1,944
11/14/2011	2.78	2.78	2.78	2.78	256	256	1,940	1,940	1,940
11/15/2011	3.38	3.38	3.38	2.89	225	225	1,766	1,766	1,508
11/16/2011	2.67	2.67	2.66	2.66	245	245	1,408	1,408	1,408
11/17/2011	2.69	2.69	2.70	2.70	246	246	1,651	1,651	1,651
11/18/2011	2.69	2.69	2.68	2.68	244	244	1,686	1,686	1,686
11/19/2011	2.77	2.77	2.76	2.76	253	253	1,709	1,709	1,709
11/20/2011	2.85	2.85	2.84	2.84	261	261	1,794	1,794	1,794
11/21/2011	2.89	2.89	2.89	2.89	266	266	1,807	1,807	1,807
11/22/2011	2.82	2.82	2.82	2.82	261	261	1,820	1,820	1,820
11/23/2011	2.84	2.84	2.84	2.84	263	263	1,692	1,692	1,692
11/24/2011	2.75	2.75	2.74	2.74	251	251	1,693	1,693	1,693
11/25/2011	2.81	2.81	2.81	2.81	258	258	1,630	1,630	1,630
11/26/2011	2.79	2.79	2.79	2.79	256	256	1,688	1,688	1,688
11/27/2011	2.79	2.79	2.78	2.78	255	255	1,681	1,681	1,681
11/28/2011	2.77	2.77	2.76	2.76	252	252	1,674	1,674	1,674
11/29/2011	2.77	2.77	2.76	2.76	251	251	1,661	1,661	1,661
11/30/2011	2.83	2.83	2.83	2.83	260	260	1,672	1,672	1,672
12/01/2011	2.75	2.75	2.74	2.74	251	251	1,715	1,715	1,715
12/02/2011	2.81	2.81	2.80	2.80	258	258	1,671	1,671	1,671
12/03/2011	2.73	2.73	2.73	2.73	248	248	1,690	1,690	1,690
12/04/2011	2.84	2.84	2.84	2.84	262	262	1,623	1,623	1,623

Adjusted Daily Values

Date	Raw 15-min SO2 Avg	Adj. 15-min SO2 Avg	Raw 3-hr SO2 Avg	Adj. 3-hr SO2 Avg	Raw ppmv SO2 Avg	Adj. ppmv SO2 Avg	Raw Daily Rate (SO2 lb/day)	Adj. Daily Rate (SO2 lb/day)	Final Daily Rate (SO2 lb/day)
12/05/2011	2.77	2.77	2.77	2.77	255	255	1,686	1,686	1,686
12/06/2011	2.65	2.65	2.69	2.69	243	243	1,536	1,536	1,536
12/07/2011	2.80	2.80	2.80	2.80	262	262	1,252	1,252	1,252
12/08/2011	2.88	2.88	2.87	2.87	271	271	1,224	1,224	1,224
12/09/2011	2.88	2.88	2.88	2.88	269	269	1,259	1,259	1,259
12/10/2011	3.01	3.01	2.99	2.99	285	285	1,256	1,256	1,256
12/11/2011	3.00	3.00	3.00	3.00	284	284	1,307	1,307	1,307
12/12/2011	2.92	2.92	2.92	2.92	272	272	1,296	1,296	1,296
12/13/2011	2.90	2.90	2.89	2.89	270	270	1,235	1,235	1,235
12/14/2011	2.84	2.84	2.85	2.85	263	263	1,235	1,235	1,235
12/15/2011	2.82	2.82	2.82	2.82	260	260	1,214	1,214	1,214
12/16/2011	2.89	2.89	2.88	2.88	267	267	1,192	1,192	1,192
12/17/2011	2.80	2.80	2.80	2.80	255	255	1,231	1,231	1,231
12/18/2011	2.78	2.78	2.78	2.78	253	253	1,199	1,199	1,199
12/19/2011	2.83	2.83	2.82	2.82	260	260	1,187	1,187	1,187
12/20/2011	2.80	2.80	2.80	2.80	257	257	1,205	1,205	1,205
12/21/2011	2.87	2.87	2.86	2.86	262	262	1,167	1,167	1,167
12/22/2011	2.75	2.75	2.77	2.77	250	250	1,192	1,192	1,192
12/23/2011	2.76	2.76	2.75	2.75	250	250	1,142	1,142	1,142
12/24/2011	2.76	2.76	2.76	2.76	249	249	1,138	1,138	1,138
12/25/2011	2.77	2.77	2.76	2.76	251	251	1,145	1,145	1,145
12/26/2011	2.81	2.81	2.80	2.80	256	256	1,142	1,142	1,142
12/27/2011	2.86	2.86	2.86	2.86	263	263	1,164	1,164	1,164
12/28/2011	2.83	2.83	2.83	2.83	261	261	1,184	1,184	1,184
12/29/2011	2.85	2.85	2.85	2.85	262	262	1,173	1,173	1,173
12/30/2011	3.05	3.05	3.03	3.03	285	285	1,117	1,117	1,117
12/31/2011	3.01	3.01	3.01	3.01	279	279	1,145	1,145	1,145
01/01/2012	3.06	3.06	3.05	3.05	286	286	1,129	1,129	1,129
01/02/2012	3.12	3.12	3.11	3.11	293	293	1,127	1,127	1,127
01/03/2012	3.44	3.42	3.37	3.35	298	298	1,146	1,146	1,139
01/04/2012	3.14	3.14	3.15	3.15	295	295	1,154	1,154	1,154
01/05/2012	3.01	3.01	3.01	3.01	281	281	1,133	1,133	1,133
01/06/2012	3.06	3.06	3.05	3.05	285	285	1,099	1,099	1,099
01/07/2012	3.08	3.08	3.08	3.08	289	289	1,119	1,119	1,119
01/08/2012	3.01	3.01	3.00	3.00	281	281	1,132	1,132	1,132
01/09/2012	2.92	2.92	2.93	2.93	269	269	1,103	1,103	1,103
01/10/2012	2.84	2.84	2.84	2.84	259	259	1,072	1,072	1,072
01/11/2012	2.75	2.75	2.74	2.74	249	249	1,038	1,038	1,038
01/12/2012	2.95	2.95	2.96	2.96	272	272	1,000	1,000	1,000
01/13/2012	2.96	2.96	2.95	2.95	274	274	1,069	1,069	1,069
01/14/2012	2.77	2.77	2.77	2.77	250	250	1,070	1,070	1,070
01/15/2012	2.88	2.88	2.87	2.87	264	264	1,004	1,004	1,004
01/16/2012	2.82	2.82	2.83	2.83	257	257	1,044	1,044	1,044
01/17/2012	2.64	2.64	2.64	2.64	236	236	1,008	1,008	1,008
01/18/2012	2.57	2.57	2.57	2.57	229	229	944	944	944
01/19/2012	2.71	2.71	2.69	2.69	246	246	935	935	935
01/20/2012	3.05	3.05	3.04	3.04	282	282	987	987	987
01/21/2012	2.45	2.45	2.53	2.53	227	227	1,073	1,073	1,073
01/22/2012	3.34	3.34	3.30	3.30	298	298	882	882	882
01/23/2012	2.82	2.82	2.81	2.81	258	258	1,161	1,161	1,161
01/24/2012	2.94	2.94	2.92	2.92	265	265	1,177	1,177	1,177
01/25/2012	3.18	3.18	3.17	3.17	291	291	1,272	1,272	1,272
01/26/2012	3.22	3.22	3.21	3.21	296	296	1,169	1,169	1,169
01/27/2012	3.17	3.17	3.17	3.17	285	285	1,179	1,179	1,179
01/28/2012	3.32	3.32	3.31	3.31	305	305	1,114	1,114	1,114
01/29/2012	3.35	3.35	3.35	3.35	310	310	1,167	1,167	1,167
01/30/2012	3.42	3.42	3.41	3.41	317	317	1,184	1,184	1,184
01/31/2012	3.27	3.27	3.27	3.27	299	299	1,212	1,212	1,212
02/01/2012	3.32	3.32	3.31	3.31	306	306	1,160	1,160	1,160
02/02/2012	3.31	3.31	3.30	3.30	304	304	1,174	1,174	1,174
02/03/2012	3.39	3.39	3.39	3.39	315	315	1,174	1,174	1,174
02/04/2012	3.37	3.37	3.37	3.37	311	311	1,205	1,205	1,205

Adjusted Daily Values

Date	Raw 15-min SO2 Avg	Adj. 15-min SO2 Avg	Raw 3-hr SO2 Avg	Adj. 3-hr SO2 Avg	Raw ppmv SO2 Avg	Adj. ppmv SO2 Avg	Raw Daily Rate (SO2 lb/day)	Adj. Daily Rate (SO2 lb/day)	Final Daily Rate (SO2 lb/day)
02/05/2012	3.36	3.36	3.36	3.36	309	309	1,185	1,185	1,185
02/06/2012	1.05	3.98	0.99	3.06	339	330	1,182	1,182	1,153
02/07/2012	3.04	3.13	3.07	3.07	288	288	1,127	1,127	1,127
02/08/2012	2.76	2.76	2.76	2.76	250	250	1,197	1,197	1,197
02/09/2012	2.78	2.78	2.78	2.78	254	254	1,051	1,051	1,051
02/10/2012	2.70	2.70	2.69	2.69	246	246	1,056	1,056	1,056
02/11/2012	2.70	2.70	2.70	2.70	246	246	1,024	1,024	1,024
02/12/2012	2.64	2.64	2.64	2.64	240	240	1,026	1,026	1,026
02/13/2012	2.61	2.61	2.61	2.61	236	236	1,000	1,000	1,000
02/14/2012	2.62	2.62	2.61	2.61	237	237	993	993	993
02/15/2012	2.43	2.43	2.45	2.45	217	217	993	993	993
02/16/2012	2.58	2.58	2.56	2.56	234	234	933	933	933
02/17/2012	2.75	2.75	2.74	2.74	253	253	976	976	976
02/18/2012	2.66	2.66	2.66	2.66	241	241	1,060	1,060	1,060
02/19/2012	2.62	2.62	2.62	2.62	236	236	1,028	1,028	1,028
02/20/2012	2.58	2.58	2.57	2.57	231	231	1,015	1,015	1,015
02/21/2012	2.51	2.51	2.51	2.51	224	224	998	998	998
02/22/2012	2.47	2.47	2.47	2.47	219	219	973	973	973
02/23/2012	2.51	2.51	2.51	2.51	226	226	947	947	947
02/24/2012	2.56	2.56	2.55	2.55	231	231	951	951	951
02/25/2012	2.60	2.60	2.60	2.60	235	235	962	962	962
02/26/2012	2.65	2.65	2.64	2.64	241	241	968	968	968
02/27/2012	2.70	2.70	2.69	2.69	246	246	987	987	987
02/28/2012	2.60	2.60	2.60	2.60	235	235	1,004	1,004	1,004
02/29/2012	2.78	2.78	2.78	2.78	255	255	970	970	970
03/01/2012	2.78	2.78	2.77	2.77	256	256	1,098	1,098	1,098
03/02/2012	2.72	2.72	2.74	2.74	249	249	1,101	1,101	1,101
03/03/2012	2.61	2.61	2.63	2.62	229	229	1,065	1,065	1,060
03/04/2012	2.29	2.29	2.27	2.27	201	201	964	964	964
03/05/2012	3.57	3.08	3.55	2.79	226	221	839	839	658
03/06/2012	2.93	2.93	2.90	2.90	263	263	778	778	778
03/07/2012	3.11	3.11	3.10	3.10	278	278	1,041	1,041	1,041
03/08/2012	3.14	3.14	3.14	3.14	285	285	1,122	1,122	1,122
03/09/2012	3.15	3.15	3.15	3.15	285	285	1,131	1,131	1,131
03/10/2012	3.22	3.22	3.21	3.21	295	295	1,129	1,129	1,129
03/11/2012	3.16	3.16	3.16	3.16	287	287	1,149	1,149	1,149
03/12/2012	3.13	3.13	3.13	3.13	283	283	1,082	1,082	1,082
03/13/2012	3.19	3.19	3.19	3.19	289	289	1,123	1,123	1,123
03/14/2012	3.09	3.09	3.10	3.10	277	277	1,153	1,153	1,153
03/15/2012	2.97	2.97	2.96	2.96	269	269	1,146	1,146	1,146
03/16/2012	3.04	3.04	3.03	3.03	276	276	1,245	1,245	1,245
03/17/2012	3.17	3.17	3.17	3.17	290	290	1,490	1,490	1,490
03/18/2012	2.97	2.97	2.97	2.97	268	268	1,728	1,728	1,728
03/19/2012	2.98	2.98	2.98	2.98	271	271	1,489	1,489	1,489
03/20/2012	3.13	3.13	3.10	3.10	288	288	1,355	1,355	1,355
03/21/2012	3.16	3.16	3.15	3.15	289	289	1,487	1,487	1,487
03/22/2012	3.07	3.07	3.10	3.10	280	280	1,450	1,450	1,450
03/23/2012	2.83	2.83	2.81	2.81	256	256	1,578	1,578	1,578
03/24/2012	2.96	2.96	2.95	2.95	270	270	1,507	1,507	1,507
03/25/2012	3.12	3.12	3.11	3.11	285	285	1,618	1,618	1,618
03/26/2012	3.19	3.19	3.19	3.19	291	291	1,716	1,716	1,716
03/27/2012	3.25	3.25	3.24	3.24	299	299	1,760	1,760	1,760
03/28/2012	3.05	3.05	3.06	3.06	279	279	1,800	1,800	1,800
03/29/2012	2.99	2.99	2.98	2.98	275	275	1,680	1,680	1,680
03/30/2012	2.97	2.97	2.98	2.98	273	273	1,646	1,646	1,646
03/31/2012	2.90	2.90	2.89	2.89	264	264	1,665	1,665	1,665
04/01/2012	2.97	2.97	2.96	2.96	272	272	1,759	1,759	1,759
04/02/2012	2.97	2.97	2.97	2.97	272	272	1,787	1,787	1,787
04/03/2012	2.98	2.98	3.06	3.06	269	269	1,784	1,784	1,784
04/04/2012	3.18	3.18	3.16	3.16	291	291	1,786	1,786	1,786
04/05/2012	2.97	2.97	3.01	3.01	269	269	1,916	1,916	1,916
04/06/2012	2.80	2.80	2.80	2.80	253	253	1,667	1,667	1,667

Adjusted Daily Values

Date	Raw 15-min SO2 Avg	Adj. 15-min SO2 Avg	Raw 3-hr SO2 Avg	Adj. 3-hr SO2 Avg	Raw ppmv SO2 Avg	Adj. ppmv SO2 Avg	Raw Daily Rate (SO2 lb/day)	Adj. Daily Rate (SO2 lb/day)	Final Daily Rate (SO2 lb/day)
04/07/2012	3.00	3.00	2.98	2.98	277	277	1,477	1,477	1,477
04/08/2012	2.97	2.97	2.97	2.97	275	275	1,585	1,585	1,585
04/09/2012	2.95	2.95	2.94	2.94	271	271	1,559	1,559	1,559
04/10/2012	2.98	2.98	2.97	2.97	275	275	1,550	1,550	1,550
04/11/2012	2.97	2.97	2.97	2.97	273	273	1,562	1,562	1,562
04/12/2012	3.07	3.07	3.05	3.05	279	279	1,558	1,558	1,558
04/13/2012	3.06	3.06	3.07	3.07	275	275	1,613	1,613	1,613
04/14/2012	2.89	2.89	2.89	2.89	262	262	1,579	1,579	1,579
04/15/2012	2.85	2.85	2.85	2.85	257	257	1,515	1,515	1,515
04/16/2012	2.83	2.83	2.82	2.82	255	255	1,488	1,488	1,488
04/17/2012	4.93	4.48	4.95	3.26	278	278	1,481	1,481	975
04/18/2012	3.10	3.10	3.10	3.10	285	285	1,300	1,300	1,300
04/19/2012	3.06	3.06	3.05	3.05	281	281	1,680	1,680	1,680
04/20/2012	3.14	3.14	3.14	3.14	288	288	1,741	1,741	1,741
04/21/2012	3.13	3.13	3.13	3.13	286	286	1,861	1,861	1,861
04/22/2012	3.16	3.16	3.14	3.14	288	288	1,891	1,891	1,891
04/23/2012	3.20	3.20	3.19	3.19	290	290	1,936	1,936	1,936
04/24/2012	3.15	3.15	3.16	3.16	284	284	1,950	1,950	1,950
04/25/2012	3.11	3.11	3.10	3.10	283	283	1,905	1,905	1,905
04/26/2012	3.09	3.09	3.09	3.09	279	279	1,886	1,886	1,886
04/27/2012	3.10	3.10	3.10	3.10	284	284	1,861	1,861	1,861
04/28/2012	3.12	3.12	3.12	3.12	289	289	1,846	1,846	1,846
04/29/2012	3.12	3.12	3.11	3.11	287	287	1,873	1,873	1,873
04/30/2012	3.12	3.12	3.12	3.12	288	288	1,873	1,873	1,873
05/01/2012	2.87	3.10	2.87	2.87	289	289	1,867	1,867	1,867
05/02/2012	3.15	3.15	3.13	3.13	289	289	1,872	1,872	1,872
05/03/2012	3.18	3.18	3.19	3.19	292	292	1,880	1,880	1,880
05/04/2012	3.05	3.05	3.05	3.05	278	278	1,887	1,887	1,887
05/05/2012	3.07	3.07	3.08	3.08	281	281	1,806	1,806	1,806
05/06/2012	2.99	2.99	2.99	2.99	273	273	1,820	1,820	1,820
05/07/2012	2.99	2.99	2.98	2.98	273	273	1,782	1,782	1,782
05/08/2012	2.96	2.96	2.97	2.97	271	271	1,786	1,786	1,786
05/09/2012	2.92	2.92	2.92	2.92	267	267	1,769	1,769	1,769
05/10/2012	2.97	2.97	2.96	2.96	272	272	1,752	1,752	1,752
05/11/2012	2.89	2.89	2.90	2.90	263	263	1,819	1,819	1,819
05/12/2012	2.93	2.93	2.91	2.91	264	264	1,858	1,858	1,858
05/13/2012	3.08	3.08	3.06	3.06	278	278	1,901	1,901	1,901
05/14/2012	3.15	3.15	3.15	3.15	286	286	2,018	2,018	2,018
05/15/2012	3.22	3.22	3.21	3.21	295	295	2,083	2,083	2,083
05/16/2012	3.20	3.20	3.22	3.22	290	290	2,152	2,152	2,152
05/17/2012	2.98	2.98	2.98	2.98	271	271	2,113	2,113	2,113
05/18/2012	3.06	3.06	3.04	3.04	281	281	1,825	1,825	1,825
05/19/2012	3.22	3.22	3.21	3.21	297	297	1,674	1,674	1,674
05/20/2012	3.29	3.29	3.29	3.29	306	306	2,081	2,081	2,081
05/21/2012	3.18	3.18	3.19	3.19	291	291	2,158	2,158	2,158
05/22/2012	3.20	3.20	3.20	3.20	292	292	2,069	2,069	2,069
05/23/2012	3.19	3.19	3.18	3.18	291	291	2,075	2,075	2,075
05/24/2012	5.45	4.06	5.45	3.37	335	330	2,069	2,069	1,281
05/25/2012	3.32	3.32	3.32	3.32	306	306	1,948	1,948	1,948
05/26/2012	3.38	3.38	3.38	3.38	312	312	2,127	2,127	2,127
05/27/2012	3.40	3.40	3.40	3.40	314	314	2,199	2,199	2,199
05/28/2012	3.35	3.35	3.34	3.34	309	309	2,205	2,205	2,205
05/29/2012	3.33	3.33	3.33	3.33	306	306	2,178	2,178	2,178
05/30/2012	3.20	3.20	3.20	3.20	293	293	2,162	2,162	2,162
05/31/2012	3.22	3.22	3.22	3.22	296	296	2,083	2,083	2,083
06/01/2012	3.11	3.11	3.04	3.04	269	269	2,100	2,100	2,100
06/02/2012	3.30	3.30	3.30	3.30	301	301	1,488	1,488	1,488
06/03/2012	3.25	3.25	3.26	3.26	295	295	2,161	2,161	2,161
06/04/2012	3.34	3.34	3.33	3.33	305	305	2,134	2,134	2,134
06/05/2012	3.22	3.36	3.28	3.28	314	314	2,191	2,191	2,191
06/06/2012	3.25	3.25	3.26	3.26	298	298	2,232	2,232	2,232
06/07/2012	3.15	3.15	3.15	3.15	287	287	2,144	2,144	2,144

Adjusted Daily Values

Date	Raw 15-min SO2 Avg	Adj. 15-min SO2 Avg	Raw 3-hr SO2 Avg	Adj. 3-hr SO2 Avg	Raw ppmv SO2 Avg	Adj. ppmv SO2 Avg	Raw Daily Rate (SO2 lb/day)	Adj. Daily Rate (SO2 lb/day)	Final Daily Rate (SO2 lb/day)
06/08/2012	3.24	3.24	3.23	3.23	297	297	2,081	2,081	2,081
06/09/2012	3.15	3.15	3.15	3.15	287	287	2,140	2,140	2,140
06/10/2012	3.27	3.27	3.25	3.25	298	298	2,081	2,081	2,081
06/11/2012	3.25	3.25	3.25	3.25	293	293	2,164	2,164	2,164
06/12/2012	3.04	3.04	3.05	3.05	273	273	2,137	2,137	2,137
06/13/2012	3.07	3.07	3.06	3.06	278	278	2,000	2,000	2,000
06/14/2012	3.10	3.10	3.09	3.09	280	280	2,024	2,024	2,024
06/15/2012	2.93	2.93	2.94	2.94	265	265	2,047	2,047	2,047
06/16/2012	2.77	2.77	2.77	2.77	253	253	1,932	1,932	1,932
06/17/2012	2.90	2.90	2.87	2.87	263	263	1,822	1,822	1,822
06/18/2012	2.98	2.98	3.00	3.00	268	268	1,916	1,916	1,916
06/19/2012	0.00	0.00	0.00	0.00	0	0	0	0	0
06/20/2012	69.98	21.16	69.19	4.00	157	157	156	156	9
06/21/2012	16.33	7.43	17.60	2.99	54	54	87	87	15
06/22/2012	75.07	11.86	74.71	3.75	334	334	89	89	4
06/23/2012	3.18	3.18	3.16	3.16	292	292	882	882	882
06/24/2012	3.38	3.38	3.37	3.37	314	314	1,935	1,935	1,935
06/25/2012	3.36	3.36	3.35	3.35	312	312	2,278	2,278	2,278
06/26/2012	3.46	3.46	3.46	3.46	325	325	2,274	2,274	2,274
06/27/2012	3.43	3.43	3.43	3.43	323	323	2,359	2,359	2,359
06/28/2012	3.43	3.43	3.43	3.43	322	322	2,332	2,332	2,332
06/29/2012	3.35	3.35	3.34	3.34	311	311	2,325	2,325	2,325
06/30/2012	3.42	3.42	3.42	3.42	319	319	2,270	2,270	2,270
07/01/2012	3.42	3.42	3.41	3.41	320	320	2,328	2,328	2,328
07/02/2012	3.41	3.41	3.41	3.41	318	318	2,340	2,340	2,340
07/03/2012	3.42	3.42	3.43	3.43	311	311	2,320	2,320	2,320
07/04/2012	3.48	3.48	3.47	3.47	323	323	2,270	2,270	2,270
07/05/2012	3.45	3.45	3.44	3.44	319	319	2,347	2,347	2,347
07/06/2012	3.45	3.45	3.45	3.45	319	319	2,338	2,338	2,338
07/07/2012	3.37	3.37	3.37	3.37	310	310	2,331	2,331	2,331
07/08/2012	3.34	3.34	3.34	3.34	307	307	2,259	2,259	2,259
07/09/2012	3.35	3.35	3.35	3.35	307	307	2,240	2,240	2,240
07/10/2012	3.43	3.43	3.42	3.42	318	318	2,237	2,237	2,237
07/11/2012	3.43	3.43	3.43	3.43	318	318	2,299	2,299	2,299
07/12/2012	3.38	3.38	3.38	3.38	313	313	2,289	2,289	2,289
07/13/2012	3.39	3.39	3.37	3.37	311	311	2,252	2,252	2,252
07/14/2012	3.43	3.43	3.43	3.43	316	316	2,273	2,273	2,273
07/15/2012	3.47	3.47	3.46	3.46	321	321	2,306	2,306	2,306
07/16/2012	3.44	3.44	3.44	3.44	318	318	2,329	2,329	2,329
07/17/2012	3.07	3.07	3.14	3.14	276	276	2,327	2,327	2,327
07/18/2012	3.43	3.43	3.42	3.42	316	316	1,688	1,688	1,688
07/19/2012	3.48	3.48	3.48	3.48	320	320	2,235	2,235	2,235
07/20/2012	3.39	3.39	3.38	3.38	307	307	2,322	2,322	2,322
07/21/2012	3.52	3.52	3.52	3.52	323	323	1,633	1,633	1,633
07/22/2012	3.42	3.42	3.42	3.42	304	304	2,326	2,326	2,326
07/23/2012	3.39	3.39	3.39	3.39	311	311	2,199	2,199	2,199
07/24/2012	3.48	3.48	3.47	3.47	322	322	2,250	2,250	2,250
07/25/2012	3.49	3.49	3.48	3.48	323	323	2,336	2,336	2,336
07/26/2012	3.43	3.43	3.43	3.43	317	317	2,344	2,344	2,344
07/27/2012	3.33	3.33	3.32	3.32	305	305	2,302	2,302	2,302
07/28/2012	3.47	3.47	3.46	3.46	322	322	2,225	2,225	2,225
07/29/2012	3.44	3.44	3.44	3.44	320	320	2,340	2,340	2,340
07/30/2012	3.48	3.48	3.48	3.48	325	325	2,322	2,322	2,322
07/31/2012	3.48	3.48	3.48	3.48	324	324	2,340	2,340	2,340
08/01/2012	3.50	3.50	3.49	3.49	325	325	2,339	2,339	2,339
08/02/2012	79.33	11.41	76.74	3.65	370	350	0	0	0
08/03/2012	3.21	3.21	3.19	3.19	292	292	699	699	699
08/04/2012	3.14	3.14	3.14	3.14	282	282	1,365	1,365	1,365
08/05/2012	3.17	3.17	3.17	3.17	286	286	1,362	1,362	1,362
08/06/2012	3.14	3.14	3.15	3.15	283	283	1,371	1,371	1,371
08/07/2012	2.71	3.37	2.65	3.03	314	314	1,486	1,486	1,486
08/08/2012	3.44	3.44	3.44	3.44	318	318	2,317	2,317	2,317

Adjusted Daily Values

Date	Raw 15-min SO2 Avg	Adj. 15-min SO2 Avg	Raw 3-hr SO2 Avg	Adj. 3-hr SO2 Avg	Raw ppmv SO2 Avg	Adj. ppmv SO2 Avg	Raw Daily Rate (SO2 lb/day)	Adj. Daily Rate (SO2 lb/day)	Final Daily Rate (SO2 lb/day)
08/09/2012	3.37	3.37	3.37	3.37	299	299	2,335	2,335	2,335
08/10/2012	3.41	3.41	3.40	3.40	316	316	1,989	1,989	1,989
08/11/2012	3.50	3.50	3.49	3.49	323	323	2,276	2,276	2,276
08/12/2012	4.06	3.69	4.02	3.55	318	318	2,368	2,368	2,092
08/13/2012	3.44	3.44	3.44	3.44	316	316	2,323	2,323	2,323
08/14/2012	3.25	3.25	3.25	3.25	297	297	2,310	2,310	2,310
08/15/2012	3.39	3.39	3.37	3.37	306	306	2,154	2,154	2,154
08/16/2012	3.34	3.34	3.33	3.33	299	299	2,207	2,207	2,207
08/17/2012	3.36	3.36	3.36	3.36	305	305	1,918	1,918	1,918
08/18/2012	3.49	3.49	3.49	3.49	320	320	1,520	1,520	1,520
08/19/2012	3.52	3.52	3.52	3.52	324	324	1,584	1,584	1,584
08/20/2012	3.52	3.52	3.51	3.51	323	323	1,598	1,598	1,598
08/21/2012	3.54	3.54	3.54	3.54	325	325	1,593	1,593	1,593
08/22/2012	3.52	3.52	3.51	3.51	322	322	1,601	1,601	1,601
08/23/2012	3.48	3.48	3.49	3.49	317	317	1,580	1,580	1,580
08/24/2012	3.42	3.42	3.42	3.42	309	309	1,563	1,563	1,563
08/25/2012	2.98	3.67	3.34	3.39	318	318	1,535	1,535	1,535
08/26/2012	3.23	3.23	2.82	3.00	291	291	1,569	1,569	1,569
08/27/2012	3.26	3.26	3.23	3.23	297	297	1,455	1,455	1,455
08/28/2012	3.15	3.15	3.17	3.17	283	283	1,442	1,442	1,442
08/29/2012	3.24	3.24	3.22	3.22	296	296	1,349	1,349	1,349
08/30/2012	3.27	3.27	3.26	3.26	300	300	1,438	1,438	1,438
08/31/2012	3.28	3.28	3.28	3.28	299	299	1,484	1,484	1,484
09/01/2012	3.22	3.22	3.22	3.22	291	291	1,484	1,484	1,484
09/02/2012	3.10	3.10	3.10	3.10	278	278	1,453	1,453	1,453
09/03/2012	3.09	3.09	3.08	3.08	279	279	1,400	1,400	1,400
09/04/2012	3.25	3.25	3.24	3.23	284	284	1,401	1,401	1,396
09/05/2012	3.03	3.03	3.02	3.02	272	272	1,417	1,417	1,417
09/06/2012	3.29	3.29	3.30	3.30	306	306	1,369	1,369	1,369
09/07/2012	3.08	3.08	3.07	3.07	278	278	1,530	1,530	1,530
09/08/2012	3.36	3.36	3.34	3.34	309	309	1,642	1,642	1,642
09/09/2012	3.30	3.30	3.31	3.31	299	299	2,181	2,181	2,181
09/10/2012	3.29	3.29	3.29	3.29	297	297	2,201	2,201	2,201
09/11/2012	3.33	3.33	3.32	3.32	302	302	2,203	2,203	2,203
09/12/2012	3.29	3.29	3.29	3.29	297	297	2,231	2,231	2,231
09/13/2012	3.32	3.32	3.31	3.31	302	302	2,200	2,200	2,200
09/14/2012	3.39	3.39	3.39	3.39	312	312	2,218	2,218	2,218
09/15/2012	3.39	3.39	3.38	3.38	312	312	2,267	2,267	2,267
09/16/2012	3.16	3.16	3.18	3.18	290	290	2,268	2,268	2,268
09/17/2012	3.25	3.25	3.24	3.24	301	301	1,801	1,801	1,801
09/18/2012	3.31	3.31	3.31	3.31	304	304	1,859	1,859	1,859
09/19/2012	3.36	3.36	3.35	3.35	308	308	2,103	2,103	2,103
09/20/2012	3.37	3.37	3.38	3.38	310	310	2,132	2,132	2,132
09/21/2012	3.32	3.32	3.31	3.31	304	304	2,139	2,139	2,139
09/22/2012	0.00	0.00	0.00	0.00	0	0	0	0	0
09/23/2012	0.00	0.00	0.00	0.00	0	0	0	0	0
09/24/2012	0.00	0.00	0.00	0.00	0	0	0	0	0
09/25/2012	0.00	0.00	0.00	0.00	0	0	0	0	0
09/26/2012	0.00	0.00	0.00	0.00	0	0	0	0	0
09/27/2012	0.00	0.00	0.00	0.00	0	0	0	0	0
09/28/2012	0.00	0.00	0.00	0.00	0	0	0	0	0
09/29/2012	0.00	0.00	0.00	0.00	0	0	0	0	0
09/30/2012	0.00	0.00	0.00	0.00	0	0	0	0	0
10/01/2012	0.00	0.00	0.00	0.00	0	0	0	0	0
10/02/2012	0.00	0.00	0.00	0.00	0	0	0	0	0
10/03/2012	0.00	0.00	0.00	0.00	0	0	0	0	0
10/04/2012	0.00	0.00	0.00	0.00	0	0	0	0	0
10/05/2012	0.00	0.00	0.00	0.00	0	0	0	0	0
10/06/2012	0.00	0.00	0.00	0.00	0	0	0	0	0
10/07/2012	0.00	0.00	0.00	0.00	0	0	0	0	0
10/08/2012	0.00	0.00	0.00	0.00	0	0	0	0	0
10/09/2012	0.00	0.00	0.00	0.00	0	0	0	0	0

Adjusted Daily Values

Date	Raw 15-min SO2 Avg	Adj. 15-min SO2 Avg	Raw 3-hr SO2 Avg	Adj. 3-hr SO2 Avg	Raw ppmv SO2 Avg	Adj. ppmv SO2 Avg	Raw Daily Rate (SO2 lb/day)	Adj. Daily Rate (SO2 lb/day)	Final Daily Rate (SO2 lb/day)
10/10/2012	0.00	0.00	0.00	0.00	0	0	0	0	0
10/11/2012	0.00	0.00	0.00	0.00	0	0	0	0	0
10/12/2012	0.00	0.00	0.00	0.00	0	0	0	0	0
10/13/2012	2675.62	21.50	2392.41	4.00	1,625	1,358	0	0	0
10/14/2012	180.85	16.25	267.45	4.00	1,519	1,069	311	311	5
10/15/2012	159.68	15.61	159.45	4.00	427	427	525	525	13
10/16/2012	32.25	6.89	32.61	3.47	481	404	493	493	52
10/17/2012	3.21	3.21	3.21	3.21	286	286	1,732	1,732	1,732
10/18/2012	25.58	11.69	16.79	3.56	548	469	1,654	1,654	351
10/19/2012	19.33	17.13	19.71	4.00	319	315	1,673	1,673	340
10/20/2012	8.10	8.10	8.67	3.42	224	224	2,261	2,261	891
10/21/2012	2.90	2.90	2.88	2.88	250	250	1,408	1,408	1,408
10/22/2012	3.15	3.15	3.14	3.14	289	289	1,512	1,512	1,512
10/23/2012	3.10	3.10	3.10	3.10	278	278	1,762	1,762	1,762
10/24/2012	3.28	3.28	3.27	3.27	301	301	2,252	2,252	2,252
10/25/2012	3.21	3.21	3.22	3.22	293	293	1,833	1,833	1,833
10/26/2012	3.20	3.20	3.19	3.19	293	293	1,785	1,785	1,785
10/27/2012	3.26	3.26	3.27	3.27	297	297	1,784	1,784	1,784
10/28/2012	3.00	3.00	2.99	2.99	267	267	1,816	1,816	1,816
10/29/2012	3.01	3.01	3.01	3.01	269	269	1,670	1,670	1,670
10/30/2012	3.06	3.06	3.06	3.06	276	276	1,671	1,671	1,671
10/31/2012	3.17	3.17	3.15	3.15	288	288	1,702	1,702	1,702
11/01/2012	3.21	3.21	3.21	3.21	293	293	1,763	1,763	1,763
11/02/2012	3.26	3.26	3.26	3.26	299	299	1,786	1,786	1,786
11/03/2012	3.20	3.20	3.20	3.20	293	293	1,809	1,809	1,809
11/04/2012	3.15	3.15	3.15	3.15	287	287	1,778	1,778	1,778
11/05/2012	3.15	3.15	3.14	3.14	288	288	1,746	1,746	1,746
11/06/2012	3.25	3.25	3.25	3.25	296	296	1,742	1,742	1,742
11/07/2012	3.39	3.39	3.37	3.37	310	310	1,775	1,775	1,775
11/08/2012	3.41	3.41	3.41	3.41	311	311	1,879	1,879	1,879
11/09/2012	3.47	3.47	3.47	3.47	316	316	1,908	1,908	1,908
11/10/2012	3.53	3.53	3.53	3.53	324	324	1,934	1,934	1,934
11/11/2012	3.46	3.46	3.45	3.45	316	316	1,960	1,960	1,960
11/12/2012	3.48	3.48	3.48	3.48	320	320	1,915	1,915	1,915
11/13/2012	3.34	3.34	3.34	3.34	304	304	1,924	1,924	1,924
11/14/2012	3.36	3.36	3.35	3.35	304	304	1,850	1,850	1,850
11/15/2012	3.32	3.32	3.35	3.35	300	300	1,883	1,883	1,883
11/16/2012	3.37	3.37	3.36	3.36	298	298	1,919	1,919	1,919
11/17/2012	3.36	3.36	3.35	3.35	300	300	1,907	1,907	1,907
11/18/2012	3.45	3.45	3.45	3.45	313	313	1,957	1,957	1,957
11/19/2012	3.36	3.36	3.36	3.36	305	305	2,006	2,006	2,006
11/20/2012	3.38	3.38	3.37	3.37	306	306	1,947	1,947	1,947
11/21/2012	3.24	3.24	3.25	3.25	291	291	1,955	1,955	1,955
11/22/2012	3.25	3.25	3.25	3.25	292	292	1,880	1,880	1,880
11/23/2012	3.21	3.21	3.21	3.21	285	285	1,877	1,877	1,877
11/24/2012	3.22	3.22	3.20	3.20	286	286	1,847	1,847	1,847
11/25/2012	3.33	3.33	3.34	3.34	299	299	1,847	1,847	1,847
11/26/2012	3.23	3.23	3.24	3.24	288	288	1,930	1,930	1,930
11/27/2012	3.34	3.34	3.33	3.33	298	298	1,866	1,866	1,866
11/28/2012	3.52	3.52	3.51	3.51	318	318	1,920	1,920	1,920
11/29/2012	3.52	3.52	3.52	3.52	318	318	2,036	2,036	2,036
11/30/2012	3.51	3.51	3.52	3.52	317	317	2,041	2,041	2,041
12/01/2012	3.33	3.33	3.33	3.33	301	301	2,054	2,054	2,054
12/02/2012	3.42	3.42	3.42	3.42	310	310	1,946	1,946	1,946
12/03/2012	3.37	3.37	3.36	3.36	305	305	1,911	1,911	1,911
12/04/2012	30965.01	12.17	27035.37	3.80	984	704	1,708	1,708	0
12/05/2012	2960.27	14.71	7061.26	3.43	719	462	696	696	0
12/06/2012	39.23	12.75	100.52	3.80	218	218	34	34	1
12/07/2012	2957.55	6.28	2570.46	3.35	228	228	545	545	1
12/08/2012	3.14	3.14	3.12	3.12	292	292	823	823	823
12/09/2012	3.00	3.00	3.00	3.00	278	278	1,410	1,410	1,410
12/10/2012	2.49	2.49	2.51	2.51	223	223	1,350	1,350	1,350

Adjusted Daily Values

Date	Raw 15-min SO2 Avg	Adj. 15-min SO2 Avg	Raw 3-hr SO2 Avg	Adj. 3-hr SO2 Avg	Raw ppmv SO2 Avg	Adj. ppmv SO2 Avg	Raw Daily Rate (SO2 lb/day)	Adj. Daily Rate (SO2 lb/day)	Final Daily Rate (SO2 lb/day)
12/11/2012	2.85	2.85	2.82	2.82	260	260	1,067	1,067	1,067
12/12/2012	2.91	2.91	2.90	2.90	262	262	1,097	1,097	1,097
12/13/2012	3.03	3.03	3.05	3.05	276	276	1,049	1,049	1,049
12/14/2012	3.03	3.03	3.00	3.00	276	276	1,078	1,078	1,078
12/15/2012	2.92	2.92	2.92	2.92	265	265	1,049	1,049	1,049
12/16/2012	3.12	3.12	3.11	3.11	285	285	1,007	1,007	1,007
12/17/2012	3.10	3.10	3.11	3.11	283	283	1,071	1,071	1,071
12/18/2012	3.10	3.10	3.10	3.10	283	283	1,070	1,070	1,070
12/19/2012	2.58	2.58	2.62	2.62	233	233	1,060	1,060	1,060
12/20/2012	2.58	2.58	2.56	2.56	237	237	1,075	1,075	1,075
12/21/2012	2.47	2.47	2.47	2.47	225	225	1,453	1,453	1,453
12/22/2012	2.50	2.50	2.49	2.49	226	226	1,393	1,393	1,393
12/23/2012	2.51	2.51	2.51	2.51	228	228	1,406	1,406	1,406
12/24/2012	2.46	2.46	2.47	2.47	221	221	1,418	1,418	1,418
12/25/2012	2.43	2.43	2.41	2.41	221	221	1,377	1,377	1,377
12/26/2012	2.47	2.47	2.46	2.46	224	224	1,359	1,359	1,359
12/27/2012	2.45	2.45	2.46	2.46	221	221	1,386	1,386	1,386
12/28/2012	2.38	2.38	2.36	2.36	215	215	1,232	1,232	1,232
12/29/2012	2.64	2.64	2.64	2.64	240	240	1,048	1,048	1,048
12/30/2012	2.62	2.62	2.60	2.60	240	240	1,165	1,165	1,165
12/31/2012	2.56	2.56	2.58	2.58	230	230	1,087	1,087	1,087
01/01/2013	3.01	3.01	3.00	3.00	274	274	833	833	833
01/02/2013	3.01	3.01	3.00	3.00	272	272	1,084	1,084	1,084
01/03/2013	2.98	2.98	2.98	2.98	270	270	1,089	1,089	1,089
01/04/2013	2.99	2.99	2.98	2.98	272	272	1,077	1,077	1,077
01/05/2013	3.00	3.00	3.05	3.05	271	271	1,077	1,077	1,077
01/06/2013	2.89	2.89	2.82	2.82	258	258	1,057	1,057	1,057
01/07/2013	3.29	3.29	3.32	3.32	300	300	986	986	986
01/08/2013	2.54	2.69	2.56	2.56	245	245	1,172	1,172	1,172
01/09/2013	5.85	3.15	5.85	2.71	210	210	965	965	446
01/10/2013	2.39	2.39	2.40	2.40	217	217	723	723	723
01/11/2013	2.26	2.26	2.26	2.26	203	203	865	865	865
01/12/2013	9.87	5.08	9.96	2.92	237	237	837	837	246
01/13/2013	2.36	2.36	2.37	2.37	213	213	709	709	709
01/14/2013	2.47	2.47	2.46	2.46	225	225	839	839	839
01/15/2013	3.06	3.06	3.02	2.80	225	225	876	876	812
01/16/2013	2.73	2.73	2.74	2.74	250	250	841	841	841
01/17/2013	2.69	2.69	2.68	2.68	245	245	978	978	978
01/18/2013	2.55	2.55	2.55	2.55	230	230	958	958	958
01/19/2013	2.51	2.51	2.51	2.51	225	225	903	903	903
01/20/2013	2.52	2.52	2.50	2.50	227	227	899	899	899
01/21/2013	2.67	2.67	2.67	2.67	242	242	909	909	909
01/22/2013	2.74	2.74	2.73	2.73	250	250	967	967	967
01/23/2013	2.87	2.87	2.88	2.88	262	262	988	988	988
01/24/2013	2.74	2.74	2.74	2.74	248	248	1,033	1,033	1,033
01/25/2013	2.75	2.75	2.75	2.75	251	251	989	989	989
01/26/2013	2.77	2.77	2.76	2.76	254	254	1,000	1,000	1,000
01/27/2013	2.68	2.68	2.68	2.68	242	242	1,006	1,006	1,006
01/28/2013	2.74	2.74	2.74	2.74	250	250	956	956	956
01/29/2013	2.68	2.68	2.68	2.68	243	243	989	989	989
01/30/2013	2.68	2.68	2.66	2.66	245	245	962	962	962
01/31/2013	2.72	2.72	2.71	2.71	247	247	960	960	960
02/01/2013	2.60	2.60	2.61	2.61	235	235	973	973	973
02/02/2013	2.70	2.70	2.70	2.70	245	245	924	924	924
02/03/2013	2.80	2.80	2.80	2.80	256	256	965	965	965
02/04/2013	2.60	2.60	2.59	2.59	235	235	1,004	1,004	1,004
02/05/2013	10.48	2.82	11.69	2.78	238	238	934	934	222
02/06/2013	2.74	2.74	2.75	2.75	250	250	951	951	951
02/07/2013	2.71	2.71	2.70	2.70	245	245	991	991	991
02/08/2013	2.63	2.63	2.64	2.64	239	239	965	965	965
02/09/2013	2.54	2.54	2.55	2.55	230	230	767	767	767
02/10/2013	2.51	2.51	2.50	2.50	226	226	934	934	934

Adjusted Daily Values

Date	Raw 15-min SO2 Avg	Adj. 15-min SO2 Avg	Raw 3-hr SO2 Avg	Adj. 3-hr SO2 Avg	Raw ppmv SO2 Avg	Adj. ppmv SO2 Avg	Raw Daily Rate (SO2 lb/day).	Adj. Daily Rate (SO2 lb/day)	Final Daily Rate (SO2 lb/day)
02/11/2013	2.51	2.51	2.51	2.51	228	228	913	913	913
02/12/2013	2.38	2.38	2.39	2.39	215	215	910	910	910
02/13/2013	2.31	2.31	2.31	2.31	211	211	935	935	935
02/14/2013	2.20	2.20	2.19	2.19	199	199	1,040	1,040	1,040
02/15/2013	2.18	2.18	2.18	2.18	198	198	991	991	991
02/16/2013	2.13	2.13	2.13	2.13	193	193	1,039	1,039	1,039
02/17/2013	2.11	2.11	2.11	2.11	190	190	1,067	1,067	1,067
02/18/2013	2.21	2.21	2.19	2.19	200	200	1,059	1,059	1,059
02/19/2013	2.14	2.14	2.14	2.14	193	193	1,101	1,101	1,101
02/20/2013	2.24	2.24	2.23	2.23	204	204	1,074	1,074	1,074
02/21/2013	2.23	2.23	2.23	2.23	204	204	1,121	1,121	1,121
02/22/2013	2.18	2.18	2.18	2.18	199	199	1,184	1,184	1,184
02/23/2013	2.37	2.37	2.36	2.36	219	219	1,289	1,289	1,289
02/24/2013	2.30	2.30	2.30	2.30	211	211	1,493	1,493	1,493
02/25/2013	2.19	2.19	2.19	2.19	200	200	1,447	1,447	1,447
02/26/2013	2.32	2.32	2.32	2.32	215	215	1,386	1,386	1,386
02/27/2013	2.19	2.19	2.19	2.19	200	200	1,469	1,469	1,469
02/28/2013	2.19	2.19	2.19	2.19	200	200	1,389	1,389	1,389
03/01/2013	2.10	2.10	2.10	2.10	190	190	1,386	1,386	1,386
03/02/2013	2.32	2.32	2.31	2.31	215	215	1,362	1,362	1,362
03/03/2013	2.39	2.39	2.37	2.37	222	222	1,526	1,526	1,526
03/04/2013	2.45	2.45	2.46	2.46	227	227	1,573	1,573	1,573
03/05/2013	2.61	2.61	2.61	2.61	230	230	1,618	1,618	1,618
03/06/2013	2.51	2.51	2.51	2.51	230	230	1,634	1,634	1,634
03/07/2013	2.63	2.63	2.62	2.62	243	243	1,648	1,648	1,648
03/08/2013	2.51	2.51	2.51	2.51	229	229	1,730	1,730	1,730
03/09/2013	121.33	17.88	109.96	3.77	1,811	1,483	1,670	1,670	57
03/10/2013	456.87	10.75	479.66	2.43	713	566	299	299	2
03/11/2013	5.16	5.06	5.13	2.38	140	140	0	0	0
03/12/2013	1352.31	13.40	1648.90	3.67	775	681	250	250	1
03/13/2013	0.00	4.54	0.00	1.50	281	281	188	188	0
03/14/2013	0.00	7.23	0.00	2.02	392	386	83	83	0
03/15/2013	2.94	2.94	0.00	2.65	264	264	604	604	0
03/16/2013	2.61	2.61	2.62	2.62	234	234	987	987	987
03/17/2013	2.43	2.43	2.41	2.41	218	218	899	899	899
03/18/2013	2.20	2.20	2.17	2.17	210	210	899	899	899
03/19/2013	2.07	2.07	2.05	2.05	200	200	899	899	899
03/20/2013	1.97	1.97	1.99	1.99	192	192	899	899	899
03/21/2013	1.93	1.93	1.92	1.92	184	184	3,212	2,461	2,461
03/22/2013	1.98	1.98	1.98	1.98	177	177	1,048	1,048	1,048
03/23/2013	1.98	1.98	1.98	1.98	181	181	1,086	1,086	1,086
03/24/2013	2.01	2.01	2.01	2.01	185	185	1,091	1,091	1,091
03/25/2013	2.00	2.00	2.00	2.00	184	184	1,118	1,118	1,118
03/26/2013	1.97	1.97	1.97	1.97	181	181	1,119	1,119	1,119
03/27/2013	1.93	1.93	1.92	1.92	176	176	1,110	1,110	1,110
03/28/2013	1.92	1.92	1.93	1.93	176	176	1,086	1,086	1,086
03/29/2013	1.90	1.90	1.90	1.90	175	175	1,084	1,084	1,084
03/30/2013	1.92	1.92	1.91	1.91	178	178	1,080	1,080	1,080
03/31/2013	1.99	1.99	1.98	1.98	184	184	1,097	1,097	1,097

Monthly Summaries

Date	Adjusted SO2 Emissions (lbs)	100% H2SO4 Production (tons)	24-M Avg SO2 (T/yr)	H2SO4 EF (lb/T)	H2SO4 Emissions (T)	24-M Avg H2SO4 (T/yr)	24-M Avg Production (T/yr)
Apr-2011	49,671	16,448	262	0.093	0.76	8.35	175,733
May-2011	69,004	20,342	264	0.093	0.95	8.35	176,717
Jun-2011	67,918	19,602	271	0.093	0.91	8.44	179,574
Jul-2011	64,293	20,190	280	0.093	0.94	8.51	181,894
Aug-2011	50,454	15,595	277	0.093	0.73	8.39	180,479
Sep-2011	42,041	12,957	277	0.093	0.60	8.39	181,208
Oct-2011	7,616	4,371	273	0.093	0.20	8.30	179,534
Nov-2011	48,418	17,340	274	0.093	0.81	8.31	180,790
Dec-2011	39,922	13,907	274	0.093	0.65	8.30	181,305
Jan-2012	33,895	11,340	275	0.154	0.87	8.49	181,382
Feb-2012	30,292	10,331	272	0.154	0.80	8.59	179,977
Mar-2012	40,948	13,616	269	0.154	1.05	8.75	178,696
Apr-2012	50,762	16,830	271	0.154	1.30	9.10	180,509
May-2012	60,233	19,323	272	0.154	1.49	9.46	181,647
Jun-2012	53,480	16,513	273	0.154	1.27	9.71	181,293
Jul-2012	69,946	20,429	279	0.154	1.57	10.13	183,324
Aug-2012	51,850	15,473	283	0.154	1.19	10.41	184,207
Sep-2012	39,494	11,777	278	0.154	0.91	10.46	180,990
Oct-2012	22,579	7,890	280	0.154	0.61	10.66	182,681
Nov-2012	56,587	16,212	287	0.154	1.25	11.02	184,922
Dec-2012	34,443	12,434	281	0.154	0.96	11.06	181,445
Jan-2013	28,353	10,428	277	0.154	0.80	11.07	178,266
Feb-2013	29,606	12,574	274	0.154	0.97	11.19	176,709
Mar-2013	30,500	13,941	268	0.154	1.07	11.32	174,932

PROJECT ROUTING FORM

FACILITY NAME: J.R. SIMPLOT COMPANY

FACILITY ID: N-767 PROJECT NUMBER: N1131840

PERMIT #'s:

DATE RECEIVED: MAY 28, 2013

PRELIMINARY REVIEW	ENGR	DATE	SUPR	DATE
A. Application Deemed Incomplete	KL	6/21/13	NRP	6/21/13
Second Information Letter	KL	7/25/13	RH	8/15/13
B. Application Deemed Complete	KL	6/5/14	RW	6/9/14
C. Application Pending Denial				
D. Application Denied				

ENGINEERING EVALUATION	INITIAL	DATE
E. Engineering Evaluation Complete	KL	11/21/14
F. Supervising Engineer Approval		
G. Compliance Division Approval [ ] Not Required		
H. Applicant's Review of Draft Authority to Construct Completed [ ] 3-day Review [ ] 10-day Review [ ] No Review Requested		
I. Permit Services Regional Manager Approval		

DIRECTOR REVIEW: [ ] Not Required [ ] Required

DIRECTOR REVIEW	INITIAL	DATE
J. Preliminary Approval to Director		
K. Final Approval to Director		

NSPS/NESHAP TRIGGERED: [ ] Yes [ ] No
If "Yes" then do the following:
1. Complete form (on AIRnet at Per » General » Internal Forms : Miscellaneous: NSPS/NESHAP Report) and attach copy to engineering evaluation.
2. Send or email form to Compliance (Tanya Good) after management approval of project.