



San Joaquin Valley

AIR POLLUTION CONTROL DISTRICT



DEC 29 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 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
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Southern Region
34946 Flyover Court
Bakersfield, CA 93308-9725
Tel: 661-392-5500 FAX: 661-392-5585

San Joaquin Valley Air Pollution Control District

Revised ERC Banking Application Review

Facility Name: J R Simplot Company
Mailing Address: P.O. Box 198
Lathrop, CA 95330-0198

Revision Date: December 1, 2016

Engineer: Kai Chan

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 SO₂-to-SO₃ conversion efficiency. The use of the new catalysts resulted in a decrease in SO₂ emissions due to the improved SO₂-to-SO₃ 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 SO₂ 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	1 st Quarter	2 nd Quarter	3 rd Quarter	4 th 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-SO₂/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)	1 st Quarter (lb/quarter)	2 nd Quarter (lb/quarter)	3 rd Quarter (lb/quarter)	4 th Quarter (lb/quarter)
SO _x (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 SO₂ rich gas stream. After being passed through a heat recovery boiler to remove heat from the gas stream, the SO₂ is passed through a two-pass four-bed catalytic converter (R-301) where it reacts with oxygen to form SO₃. After the first converter, the now SO₃ rich gas stream is cooled and sent to an intermediate absorbing tower where much of the SO₃ 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 SO₂ is converted to SO₃. 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 SO₃ is absorbed into a concentrated sulfuric acid solution. The produced sulfuric acid is pumped into storage tanks.

The operation will emit SO₂ 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 SO₂ emissions by converting a higher quantity of SO₂ into SO₃ during the sulfuric acid manufacturing process.

V. EMISSIONS CALCULATIONS:

A. Assumptions:

1. SO_x (as SO₂), sulfuric acid mist, PM₁₀ (sulfuric acid mist emissions with an aerodynamic diameter less than 10 microns), and NO_x will be emitted by the sulfuric acid manufacturing process. However, SO₂ emission reductions will only be generated due to the use of the high efficiency catalysts in the existing converters due to the improved SO₂-to-SO₃ conversion process.
2. Other assumptions will be stated as they are made.

B. Emission Factors (EF):

1. Pre-Modification SO₂ Emission Factors (EF1):

The sulfuric acid production plant exhaust stack is equipped with continuous emissions monitors (CEMS) to measure SO₂ 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 SO₂ Emission Factors (EF2):

The post-modification SO₂ emission factor is based on the applicant's proposed SO_x 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
SO _x Acid Plant (EF2)	2.5 lb-SO ₂ /ton of 100% sulfuric acid produced ⁽¹⁾
SO _x Acid Plant (Daily PE2)	1,750 lb-SO ₂ /day
SO _x 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 SO_x 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. SO₂ 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:

$$\begin{aligned} \text{Quarterly Operating Percentage} &= (\text{HAE}_{\text{Quarterly Emissions}} \div \text{HAE}_{\text{Total Annual Emissions}}) \times 100\% \\ &= (\text{HAE}_{\text{Quarterly Emissions}} \div 536,153 \text{ lb-SO}_2/\text{year}) \times 100\% \end{aligned}$$

$$\begin{aligned} \text{Quarterly PE2 (lb-SO}_2/\text{quarter)} &= \text{Annual PE2 (lb-SO}_2/\text{year)} \\ &\quad \times \text{Quarterly Operating Percentage} \\ &= 410,296 \text{ lb-SO}_2/\text{year} \\ &\quad \times \text{Quarterly Operating Percentage} \end{aligned}$$

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

$$\text{AER (lb-SO}_2\text{/quarter)} = \text{HAE (lb-SO}_2\text{/quarter)} - \text{PE2 (lb-SO}_2\text{/quarter)}$$

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:

$$\text{Air Quality Improvement Deduction} = \text{AER} \times 0.10$$

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:

$$\text{Bankable Emission Reductions} = \text{AER} - \text{Air Quality Improvement Deductions}$$

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 SO₂ emissions due to the improved SO₂-to-SO₃ 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-SO₂/ton of sulfuric acid produced and 351 lb-SO₂/day, which verified compliance with the current SOx emission limits of 2.5 lb-SO₂/ton of sulfuric acid produced and 1,750 lb-SO₂/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-SO₂/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 (SO₂) emissions to not exceed 4 lb/ton (2 kg/metric ton) expressed as 100 percent H₂SO₄. 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 SO₂, 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-SO_x/day, 102.5 lb-SO_x/hour, or 1.71 lb-SO_x/min (based on operating 24 hr/day or 1,440 min/day). Therefore, the volume of SO₂ can be calculated using the following formula based on the ideal gas equation with an exhaust flow rate of 21,602 dscf/min:

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

$$\text{SO}_2 \text{ Concentration} = 469.4 \text{ ppmv} < 2,000 \text{ ppmv (or 0.2\%)}$$

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 from any sulfuric acid unit, effluent process gas containing more than: (1) 500 ppm of sulfur compounds expressed as SO₂, 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 SO₂.

As determined above, HAE was calculated based on a maximum SO₂ 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 SO₂ 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 (SO₂): 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 SO₂ 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
☒ 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

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	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	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	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	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	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	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	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	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	2,129	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	1,231	1,231	1,231

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

COPY

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 SO_x 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 SO_x 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. NO_x emissions from the sulfur furnace serving the sulfuric acid plant shall not exceed 0.154 lb-NO_x per ton of sulfuric acid produced. [District Rule 2201]
10. The Zeeeco 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 Zeeeco 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

These terms and conditions are part of the Facility-wide Permit to Operate.

Facility Name: J R SIMPLOT COMPANY
Location: 16777 S HOWLAND ROAD, LATHROP, CA 95330
Permit No: N-767-9-21

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-NO_x/MMBtu, 0.00285 lb-SO_x/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

These terms and conditions are part of the Facility-wide Permit to Operate.

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

These terms and conditions are part of the Facility-wide Permit to Operate.