Gainesville Renewable Energy Center

11201 NW 13th Street
Gainesville, FL 32653
www.gainesvillebiomass.com

July 16, 2014

Via Electronic Mail

Christopher Kirts
Professional Engineer
Compliance Assurance, Northeast District
Florida Department of Environmental Protection
8800 Baymeadows Way W, Suite 100
Jacksonville, FL 32256

Re: Gainesville Renewable Energy Center, LLC (GREC)
Air Permit No. 0010131-003-AC (PSD-FL-411)

Dear Mr. Kirts,

On behalf of the Gainesville Renewable Energy Center (GREC), I want to thank you for meeting with us and discussing GREC's plans for ensuring compliance with the requirements of the Florida Department of Environmental Protection (Department or FDEP). As promised, I am sending you this letter to confirm and supplement the information GREC provided to you during its recent meeting with the Department.

In its recent quarterly emissions reports, GREC acknowledged that there had been certain exceedances of the short-term NO_x emission limit of 0.070 lb/MMBtu (24-hour rolling average basis). The Department's permit for GREC shows that this emission limit was requested by GREC during the permitting process; it is not a BACT requirement. This short-term emission rate was established to ensure that GREC does not exceed a NO_x emission cap of 416.4 tons per year (tpy). Although GREC has reported certain exceedances of this short-term NOx emission limit, it should be noted that as of July 1, 2014, GREC's total NO_x emissions to date are approximately 99.4 tons. This total includes the excess emissions. Over a 12 month period, GREC is projected to emit a total of approximately 202 tpy of NO_x, which is less than half of the amount allowed under the emission cap.

NO_x emissions from GREC's Bubbling Fluidized Bed (BFB) Boiler are controlled by using Selective Catalytic Reduction (SCR) control technology. In the SCR system, ammonia is injected into the flue gas while the gas is passing through a catalyst bed. With the SCR system, the ammonia reacts with the NO_x emissions from the BFB boiler to form N_2 and water.

The SCR system is the state-of-the-art for NOx control and it is exceptionally effective for reducing NOx emissions. However, the temperature of the catalyst is a critical factor for the proper operation of the SCR. The catalyst temperature must be at least 375 °F before ammonia can be injected into the SCR system. The catalyst in the SCR system is heated by the flue gas from the BFB Boiler. During a cold or warm startup of the boiler (e.g., following a shutdown or malfunction), it takes time for the flue gases to heat the catalyst to the minimum temperature required for normal SCR operations. Since ammonia cannot be injected into the SCR system until the catalyst temperature is equal to or greater than 375 °F, the SCR system cannot operate properly and the NOx emissions will be elevated until the minimum temperature is

reached and ammonia injection begins. The NOx exceedances that have been reported to FDEP are the result of periods when the SCR was not fully operational because the minimum catalyst temperature had not been reached and the injection of ammonia had not commenced. Conversely, there have been no NOx exceedances during periods when the SCR was operating at normal temperatures (i.e., above 375º F).

GREC has used an aggressive, proactive approach to evaluate the circumstances leading to the NO_x exceedances. GREC's analysis of the issues also identified several important "lessons learned" with regard to these excess NO_x emissions. GREC also proactively decided to bring these issues to the attention of the Department. GREC wanted to discuss the circumstances that lead to the excess emission to date, as well as possible corrective actions that could be pursued to avoid having any exceedances in the future.

During GREC's discussions with the Department, GREC learned that GREC had been incorrectly calculating the 24-hour rolling average and, consequently, GREC had reported more exceedances than had actually occurred. GREC has revised its calculations to be consistent with the requirements of its permit and the Department's guidance. The revised excess emissions calculations are provided as Attachment A to this letter. The attachment provides the emissions data for all of the periods in which a startup, shutdown, or malfunction exclusion has been applied, or excess emissions have occurred, since commencement of operation. The revised calculations show that there have been only two days in which emission exceedances have occurred and those exceedances spanned a total of 45 hours.

When considering these issues, please remember that GREC is the only operating biomass-fired facility in the United States that uses a SCR control device to control NO_x emissions. For this reason, GREC had to deal with unique issues. It also had to go through a learning curve following the commencement of its commercial operations in late 2013. Nonetheless, GREC has been working diligently to improve its operating procedures and it has been training its employees to minimize the potential for excess emissions in the future. Attachment B provides a list of some of the actions GREC has implemented to ensure excess emissions are minimized.

In order to provide the Department with reasonable assurance that NOx exceedances will be eliminated, GREC is implementing several corrective actions. The short-term corrective action is to lower the "set point" for the SCR following a cold or warm startup (i.e., a period when the facility's short term emissions are elevated because the catalyst had not reached its minimum operating temperature). Typically the SCR is set to control NOx emissions to approximately 0.06 lb/MMBtu during normal operation. Following a startup or similar event, the SCR set point will be reduced to 0.04 lb/MMBtu. Lowering the set point will result in a lower NOx average on a 24-hour rolling average basis and thus reduce the risk of an exceedance. The long-term corrective action will be to submit an application for a concurrent air construction/title V operation permit revision to account for the situations in which excess emissions occur. The permit application will be based on the lessons learned since commencing commercial operations.

GREC would like to thank the Department again for meeting with us to discuss these issues and potential corrective actions. GREC also would like to assure the Department that corrective actions have been

taken and will continue to be taken to minimize excess emissions. If you have any questions or concerns, feel free to contact me at 774-644-2240.

Respectfully,

Leonard J. Fagan
Vice President of Engineering

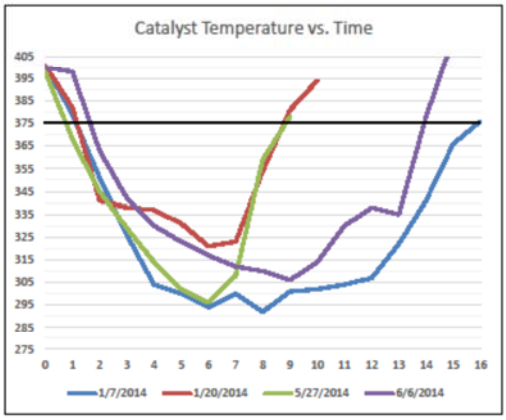
LJF/cw

Cc: James R. Maher, P.E., DEP: Jim.Maher@dep.state.fl.us
Andrew D. Bass, P.E., ECT: abass@ectinc.com
David S. Dee, Esq., GBW Legal: ddee@gbwlegal.com
Al Morales, EMI: amorles@emienergy.com
Stuart Sohn, EMI: ssohn@emienergy.com
Ali Leaphart, GREC: ali.leaphart@grecbiomass.com
Russell Abel, GREC: russell.abel@grecbiomass.com

Attachment A
Excess Emission Calculation

NO_x Excess Emissions Summary												
Event		4th Quarter 2013	1st Quarter 2014			2nd Quarter 2014						Total
		12/13/2013	1/7/2014	1/20/2014	3/16/2014	4/25/2014	5/13/2014	5/27/2014	6/6/2014	6/20/2014	6/29/2014	
Exclusions	Startup (14 hours)	14	0	0	13	11	6	0	0	0	0	44
	Startup (19 hours)	0	0	0	0	0	0	0	9	21	8	38
	Hot Startup (2 hours)	0	2	2	0	0	0	2	3	0	0	9
	Shutdown	2	3	0	2	0	0	0	3	2	2	14
	Malfunction	0	2	2	0	0	0	2	4	0	0	10
	Catalyst Temperature Below 375	0	8	3	0	0	0	4	5	0	0	20
Exceedances	Current Permit	0	20	0	0	0	0	0	25	0	0	45
	Corrective Action	0	0	0	0	0	0	0	0	0	0	0

Catalyst Temperature During Malfunctions				
Hours (starting the hour before malfunction)	1/7/2014	1/20/2014	5/27/2014	6/6/2014
0	401	401	398	400
1	379	382	368	398
2	351	341	345	363
3	326	338	329	342
4	304	337	314	330
5	300	331	302	323
6	294	321	296	317
7	300	323	308	312
8	292	354	359	310
9	301	381	378	306
10	302	394		314
11	304			330
12	307			338
13	322			335
14	341			378
15	366			413
16	376			



Legend

Low Point Temperature

Hour When Ammonia Can Be Injected

Date/Time	1-Hour Online - NOx #/MMbtu	Event	Hours of Event	Temperature	14 Hour Startup	
					Valid Hour	24HR ROLL
11/23/2013 0:00	0.05				0.05	
11/23/2013 1:00	0.05				0.05	
11/23/2013 2:00	0.05				0.05	
11/23/2013 3:00	0.05				0.05	
11/23/2013 4:00	0.05				0.05	
11/23/2013 5:00	0.05				0.05	
11/23/2013 6:00	0.05				0.05	
11/23/2013 7:00	0.05				0.05	
11/23/2013 8:00	0.05				0.05	
11/23/2013 9:00	0.05				0.05	
11/23/2013 10:00	0.05				0.05	
11/23/2013 11:00	0.05				0.05	
11/23/2013 12:00	0.05				0.05	
11/23/2013 13:00	0.05				0.05	
11/23/2013 14:00	0.05				0.05	
11/23/2013 15:00	0.05				0.05	
11/23/2013 16:00	0.05				0.05	
11/23/2013 17:00	0.05				0.05	
11/23/2013 18:00	0.05				0.05	
11/23/2013 19:00	0.05				0.05	
11/23/2013 20:00	0.05				0.05	
11/23/2013 21:00	0.05				0.05	
11/23/2013 22:00	0.05				0.05	
11/23/2013 23:00	0.08	S/D	1		0.06	0.050
11/24/2013 0:00	0.16	S/D	2		0	0.048
12/13/2013 7:00	0	S/U	1	67	0.04	0.048
12/13/2013 8:00	0	S/U	2	59	0.04	0.048
12/13/2013 9:00	0	S/U	3	62	0.04	0.047
12/13/2013 10:00	0.06			70	0.02	0.046
12/13/2013 11:00	0			90	0.02	0.045
12/13/2013 12:00	0.04			122	0.11	0.047
12/13/2013 13:00	0.04			161	0.11	0.050
12/13/2013 14:00	0.04			196	0.11	0.052
12/13/2013 15:00	0.02			224	0.11	0.055
12/13/2013 16:00	0.02			248	0.08	0.056
12/13/2013 17:00	0.08	S/U	4	266	0.07	0.057
12/13/2013 18:00	0.1	S/U	5	272	0.06	0.057
12/13/2013 19:00	0.08	S/U	6	275	0.05	0.057
12/13/2013 20:00	0.11	S/U	7	276	0.05	0.057
12/13/2013 21:00	0.18	S/U	8	276	0.05	0.057
12/13/2013 22:00	0.12	S/U	9	276	0.05	0.057
12/13/2013 23:00	0.12	S/U	10	283	0.04	0.057
12/14/2013 0:00	0.1	S/U	11	331	0.04	0.056
12/14/2013 1:00	0.11	S/U	12	351	0.04	0.056
12/14/2013 2:00	0.12	S/U	13	360	0.05	0.056
12/14/2013 3:00	0.11	S/U	14	368	0.05	0.056
12/14/2013 4:00	0.11			371	0.05	0.056
12/14/2013 5:00	0.11			374	0.06	0.056
12/14/2013 6:00	0.11	NH3 In 0628		376	0.06	0.058
12/14/2013 7:00	0.11				0.05	0.059
12/14/2013 8:00	0.08				0.05	0.059
12/14/2013 9:00	0.07					
12/14/2013 10:00	0.06					
12/14/2013 11:00	0.05					
12/14/2013 12:00	0.05					
12/14/2013 13:00	0.05					
12/14/2013 14:00	0.05					
12/14/2013 15:00	0.04					
12/14/2013 16:00	0.04					
12/14/2013 17:00	0.04					
12/14/2013 18:00	0.05					
12/14/2013 19:00	0.05				Total Exceedances	0

Excluded Emissions Legend	Hours Excluded
Startup (14 hours)	14
Startup (19 hours)	0
Hot Startup (2 hours)	0
Shutdown	2
Malfunction	0
Catalyst Temperature Below 375	0

Date/Time	1-Hour Online - NOx #/MMbtu	Event	Hours of Event	Temperature	2 Hour Hot Startup & 2 Hour Malfunction Exclusion			Emissions Excluded when Catalyst Temp. below 375	
					Valid Hour	24HR ROLL		Valid Hour	24HR ROLL
1/6/2014 0:00	0.05				0.05			0.05	
1/6/2014 1:00	0.05				0.05			0.05	
1/6/2014 2:00	0.05				0.05			0.05	
1/6/2014 3:00	0.05				0.05			0.05	
1/6/2014 4:00	0.05				0.05			0.05	
1/6/2014 5:00	0.05				0.05			0.05	
1/6/2014 6:00	0.05				0.05			0.05	
1/6/2014 7:00	0.05				0.05			0.05	
1/6/2014 8:00	0.05				0.05			0.05	
1/6/2014 9:00	0.05				0.05			0.05	
1/6/2014 10:00	0.05				0.05			0.05	
1/6/2014 11:00	0.05				0.05			0.05	
1/6/2014 12:00	0.05				0.05			0.05	
1/6/2014 13:00	0.05				0.05			0.05	
1/6/2014 14:00	0.05				0.05			0.05	
1/6/2014 15:00	0.05				0.05			0.05	
1/6/2014 16:00	0.05				0.05			0.05	
1/6/2014 17:00	0.05				0.05			0.05	
1/6/2014 18:00	0.05				0.05			0.05	
1/6/2014 19:00	0.06				0.06			0.06	
1/6/2014 20:00	0.06				0.06			0.06	
1/6/2014 21:00	0.06				0.06			0.06	
1/6/2014 22:00	0.05				0.05			0.05	
1/6/2014 23:00	0.05				0.05			0.05	
1/7/2014 0:00	0.05				0.05			0.05	
1/7/2014 1:00	0.05				0.05			0.05	
1/7/2014 2:00	0.05				0.05			0.05	
1/7/2014 3:00	0.05				0.05			0.05	
1/7/2014 4:00	0.05				0.05			0.05	
1/7/2014 5:00	0.05				0.05			0.05	
1/7/2014 6:00	0.04				0.04			0.04	
1/7/2014 7:00	0.05				0.05			0.05	
1/7/2014 8:00	0.05				0.05			0.05	
1/7/2014 9:00	0.05			401	0.05			0.05	
1/7/2014 10:00	0.03			379	0.03	0.050		0.03	0.050
1/7/2014 11:00	0	Down	1	351	0.14	0.054		0.08	0.051
1/7/2014 12:00	0	Down	2	326	0.16	0.058		0.06	0.052
1/7/2014 13:00	0.23	Down	3	304	0.12	0.061		0.06	0.052
1/7/2014 14:00	0.18	HOT	1	300	0.13	0.065		0.06	0.053
1/7/2014 15:00	0.15	HOT	2	294	0.11	0.067		0.06	0.053
1/7/2014 16:00	0.12	MALF	1	300	0.12	0.070		0.06	0.053
1/7/2014 17:00	0.18	MALF	2	292	0.11	0.073		0.06	0.054
1/7/2014 18:00	0.14			301	0.1	0.075		0.05	0.054
1/7/2014 19:00	0.16			302	0.08	0.075		0.05	0.053
1/7/2014 20:00	0.12			304	0.06	0.075		0.05	0.053
1/7/2014 21:00	0.13			307	0.06	0.075		0.05	0.053
1/7/2014 22:00	0.11			322	0.06	0.076		0.05	0.053
1/7/2014 23:00	0.12			341	0.06	0.076		0.05	0.053
1/8/2014 0:00	0.11			366	0.06	0.077		0.06	0.053
1/8/2014 1:00	0.1	NH3 In 0133		376	0.06	0.077		0.06	0.053
1/8/2014 2:00	0.08				0.05	0.077		0.05	0.053
1/8/2014 3:00	0.06				0.05	0.077		0.05	0.053
1/8/2014 4:00	0.06				0.05	0.077		0.05	0.053
1/8/2014 5:00	0.06				0.05	0.077		0.05	0.053
1/8/2014 6:00	0.06				0.05	0.078		0.05	0.054
1/8/2014 7:00	0.06				0.05	0.078		0.05	0.054
1/8/2014 8:00	0.06				0.06	0.078		0.05	0.054
1/8/2014 9:00	0.05				0.06	0.078		0.04	0.053
1/8/2014 10:00	0.05				0.05	0.079		0	0.052
1/8/2014 11:00	0.05				0.05	0.075		0	0.049
1/8/2014 12:00	0.05				0.05	0.071		0	0.046
1/8/2014 13:00	0.05				0.05	0.068		0	0.044
1/8/2014 14:00	0.05				0.05	0.065		0	0.041
1/8/2014 15:00	0.06				0.05	0.062		0	0.039
1/8/2014 16:00	0.06							0	0.036
1/8/2014 17:00	0.05							0	0.034
1/8/2014 18:00	0.05							0	0.032
1/8/2014 19:00	0.05							0	0.030
1/8/2014 20:00	0.05							0	0.028
1/8/2014 21:00	0.05							0	0.025
1/8/2014 22:00	0.05				Total Exceedances	20			0
					Maximum	0.079			

Excluded Emissions Legend	Hours Excluded
Startup (14 hours)	0
Startup (19 hours)	0
Hot Startup (2 hours)	2
Shutdown	3
Malfunction	2
Catalyst Temperature Below 375	8

Date/Time	1-Hour Online - NOx #/MMbtu	Event	Hours of Event	Temperature	2 Hour Hot Startup & 2 Hour Malfunction Exclusion			Emissions Excluded when Catalyst Temp. below 375	
					Valid Hour	24HR ROLL		Valid Hour	24HR ROLL
1/19/2014 0:00	0.05				0.05			0.05	
1/19/2014 1:00	0.05				0.05			0.05	
1/19/2014 2:00	0.05				0.05			0.05	
1/19/2014 3:00	0.04				0.04			0.04	
1/19/2014 4:00	0.04				0.04			0.04	
1/19/2014 5:00	0.05				0.05			0.05	
1/19/2014 6:00	0.04				0.04			0.04	
1/19/2014 7:00	0.05				0.05			0.05	
1/19/2014 8:00	0.05				0.05			0.05	
1/19/2014 9:00	0.04				0.04			0.04	
1/19/2014 10:00	0.05				0.05			0.05	
1/19/2014 11:00	0.05				0.05			0.05	
1/19/2014 12:00	0.05				0.05			0.05	
1/19/2014 13:00	0.05				0.05			0.05	
1/19/2014 14:00	0.05				0.05			0.05	
1/19/2014 15:00	0.05				0.05			0.05	
1/19/2014 16:00	0.05				0.05			0.05	
1/19/2014 17:00	0.05				0.05			0.05	
1/19/2014 18:00	0.05				0.05			0.05	
1/19/2014 19:00	0.05				0.05			0.05	
1/19/2014 20:00	0.06				0.06			0.06	
1/19/2014 21:00	0.06				0.06			0.06	
1/19/2014 22:00	0.06				0.06			0.06	
1/19/2014 23:00	0.06				0.06			0.06	
1/20/2014 0:00	0.06				0.06			0.06	
1/20/2014 1:00	0.06				0.06			0.06	
1/20/2014 2:00	0.06				0.06			0.06	
1/20/2014 3:00	0.06				0.06			0.06	
1/20/2014 4:00	0.06				0.06			0.06	
1/20/2014 5:00	0.06				0.06			0.06	
1/20/2014 6:00	0.06				0.06			0.06	
1/20/2014 7:00	0.07				0.07			0.07	
1/20/2014 8:00	0.06				0.06			0.06	
1/20/2014 9:00	0.07				0.07	0.057		0.07	0.057
1/20/2014 10:00	0.07				0.07	0.058		0.07	0.058
1/20/2014 11:00	0.07			401	0.07	0.058		0.07	0.058
1/20/2014 12:00	0.07			382	0.07	0.059		0.07	0.059
1/20/2014 13:00	0.12	HOT	1	341	0.05	0.059		0.1	0.061
1/20/2014 14:00	0.08	HOT	2	338	0.12	0.062		0.09	0.063
1/20/2014 15:00	0.05			337	0.12	0.065		0.07	0.064
1/20/2014 16:00	0.14	MALF	1	331	0.1	0.067		0.06	0.064
1/20/2014 17:00	0.12			321	0.09	0.069		0.05	0.064
1/20/2014 18:00	0.16	MALF	2	323	0.07	0.070		0.05	0.064
1/20/2014 19:00	0.12			354	0.06	0.070		0.05	0.064
1/20/2014 20:00	0.1	NH3 In 2037		381	0.05	0.070		0.05	0.064
1/20/2014 21:00	0.09			394	0.05	0.069		0.05	0.063
1/20/2014 22:00	0.07				0.05	0.069		0.05	0.063
1/20/2014 23:00	0.06				0.05	0.068		0.05	0.063
1/21/2014 0:00	0.05				0.05	0.068		0.05	0.062
1/21/2014 1:00	0.05				0.05	0.068		0.04	0.061
1/21/2014 2:00	0.05				0.05	0.067		0.04	0.060
1/21/2014 3:00	0.05				0.05	0.067		0.05	0.060
1/21/2014 4:00	0.05				0.04	0.066		0.05	0.060
1/21/2014 5:00	0.05				0.04	0.065		0.05	0.059
1/21/2014 6:00	0.05				0.05	0.065		0.04	0.058
1/21/2014 7:00	0.05				0.05	0.064		0.05	0.058
1/21/2014 8:00	0.04				0.05	0.063		0.04	0.057
1/21/2014 9:00	0.04				0.04	0.062		0.05	0.056
1/21/2014 10:00	0.05				0.05	0.061		0.05	0.055
1/21/2014 11:00	0.05				0.04	0.060		0.05	0.054
1/21/2014 12:00	0.05				0.05	0.059		0.04	0.053
1/21/2014 13:00	0.04				0.05	0.059		0.04	0.050
1/21/2014 14:00	0.05				0.05	0.056		0.04	0.048
1/21/2014 15:00	0.04				0.04	0.053		0.05	0.048
1/21/2014 16:00	0.05				0.04	0.050		0.04	0.047
1/21/2014 17:00	0.05				0.04	0.048		0.05	0.047
1/21/2014 18:00	0.05				0.05	0.048		0	0.045
1/21/2014 19:00	0.04				0.04	0.047		0	0.043
1/21/2014 20:00	0.04				0.05	0.047		0	0.040
1/21/2014 21:00	0.04				0.04	0.046		0	0.038
1/21/2014 22:00	0.05				0.05	0.046		0	0.036
1/21/2014 23:00	0.04				Total Exceedances	0			0

Excluded Emissions Legend	Hours Excluded
Startup (14 hours)	0
Startup (19 hours)	0
Hot Startup (2 hours)	2
Shutdown	0
Malfunction	2
Catalyst Temperature Below 375	3

Date/Time	1-Hour Online - NOx #/MMbtu	Event	Hours of Event	Temperature	14 Hour Startup	
					Valid Hour	24HR ROLL
3/10/2014 23:00	0.04				0.040	
3/11/2014 0:00	0.04				0.040	
3/11/2014 1:00	0.04				0.040	
3/11/2014 2:00	0.04				0.040	
3/11/2014 3:00	0.04				0.040	
3/11/2014 4:00	0.04				0.040	
3/11/2014 5:00	0.04				0.040	
3/11/2014 6:00	0.04				0.040	
3/11/2014 7:00	0.04				0.040	
3/11/2014 8:00	0.04				0.040	
3/11/2014 9:00	0.04				0.040	
3/11/2014 10:00	0.04				0.040	
3/11/2014 11:00	0.04				0.040	
3/11/2014 12:00	0.04				0.040	
3/11/2014 13:00	0.04				0.040	
3/11/2014 14:00	0.04				0.040	
3/11/2014 15:00	0.04				0.040	
3/11/2014 16:00	0.04				0.040	
3/11/2014 17:00	0.04				0.040	
3/11/2014 18:00	0.04				0.040	
3/11/2014 19:00	0.04				0.040	
3/11/2014 20:00	0.04				0.040	
3/11/2014 21:00	0.05				0.050	
3/11/2014 22:00	0	Down			0.000	
3/15/2014 22:00	0	S/U	1	81	0.040	
3/15/2014 23:00	0.04	S/U	2	93	0.070	
3/16/2014 0:00	0.07	S/U	3	108	0.070	
3/16/2014 1:00	0.07	S/U	4	137	0.070	
3/16/2014 2:00	0.08	S/U	5	153	0.050	
3/16/2014 3:00	0.09	S/U	6	173	0.040	
3/16/2014 4:00	0.09	S/U	7	193	0.050	
3/16/2014 5:00	0.07	S/U	8	212	0.050	
3/16/2014 6:00	0.05	S/U	9	225	0.050	
3/16/2014 7:00	0.04	S/U	10	227	0.060	
3/16/2014 8:00	0.05	S/U	11	233	0.040	
3/16/2014 9:00	0.05	S/U	12	261	0.040	0.045
3/16/2014 10:00	0.05	S/U	13	272	0.030	0.045
3/16/2014 11:00	0.06	S/U	14	283	0.070	0.046
3/16/2014 12:00	0.04			287	0.220	0.053
3/16/2014 13:00	0.04			291	0.130	0.057
3/16/2014 14:00	0.03			295	0.100	0.060
3/16/2014 15:00	0.07			298	0.050	0.060
3/16/2014 16:00	0.22			291	0.050	0.060
3/16/2014 17:00	0.13			310	0.040	0.060
3/16/2014 18:00	0.1			335	0.090	0.063
3/16/2014 19:00	0.12	S/D	1	337	0.060	0.063
3/16/2014 20:00	0.69	S/D	2	318	0.040	0.063
3/17/2014 5:00	0.11	S/U	1	213	0.030	0.064
3/17/2014 6:00	0.13	S/U	2	262	0.030	0.064
3/17/2014 7:00	0.08	S/U	3	295	0.030	0.062
3/17/2014 8:00	0.05	S/U	4	311	0.040	0.061
3/17/2014 9:00	0.05	S/U	5	318	0.040	0.060
3/17/2014 10:00	0.04	S/U	6	310	0.040	0.059
3/17/2014 11:00	0.09	S/U	7	289	0.040	0.059
3/17/2014 12:00	0.18	S/U	8	271	0.040	0.059
3/17/2014 13:00	0.22	S/U	9	262	0.040	0.058
3/17/2014 14:00	0.11	S/U	10	244	0.040	0.058
3/17/2014 15:00	0.11	S/U	11	245	0.040	0.057
3/17/2014 16:00	0.11	S/U	12	308	0.040	0.057
3/17/2014 17:00	0.1	S/U	13	357	0.040	0.057
3/17/2014 18:00	0.09	NH3 In 1923 DST	14	375	0.060	0.058
3/17/2014 19:00	0.06			380	0.090	0.059
3/17/2014 20:00	0.04				0.070	0.053
3/17/2014 21:00	0.03				0.060	0.050
3/17/2014 22:00	0.03				0.050	0.048
3/17/2014 23:00	0.03				0.050	0.048
3/18/2014 0:00	0.04				0.040	0.048
3/18/2014 1:00	0.04				0.040	0.048
3/18/2014 2:00	0.04				0.040	0.045
3/18/2014 3:00	0.04				0.040	0.045
					Total Exceedances	0

Excluded Emissions Legend	Hours Excluded
Startup (14 hours)	13
Startup (19 hours)	0
Hot Startup (2 hours)	0
Shutdown	2
Malfunction	0
Catalyst Temperature Below 375	0

Date/Time	1-Hour Online - NOx #/MMbtu	Event	Hours of Event	Temperature	14 Hour Startup	
					Valid Hour	24HR ROLL
4/22/2014 0:00	0.05					
4/22/2014 1:00	0.05					
4/22/2014 2:00	0.05					
4/22/2014 3:00	0.05					
4/22/2014 4:00	0.05					
4/22/2014 5:00	0.05					
4/22/2014 6:00	0.05					
4/22/2014 7:00	0.05					
4/22/2014 8:00	0.05					
4/22/2014 9:00	0.05					
4/22/2014 10:00	0.05					
4/22/2014 11:00	0.05					
4/22/2014 12:00	0.05					
4/22/2014 13:00	0.05					
4/22/2014 14:00	0.05					
4/22/2014 15:00	0.05					
4/22/2014 16:00	0.05					
4/22/2014 17:00	0.05					
4/22/2014 18:00	0.05					
4/22/2014 19:00	0.05					
4/22/2014 20:00	0.05					
4/22/2014 21:00	0.05					
4/22/2014 22:00	0.05					
4/22/2014 23:00	0.05					
4/23/2014 0:00	0.05				0.05	
4/23/2014 1:00	0.05				0.05	
4/23/2014 2:00	0.05				0.05	
4/23/2014 3:00	0.05				0.05	
4/23/2014 4:00	0.05				0.05	
4/23/2014 5:00	0.05				0.05	
4/23/2014 6:00	0.05				0.05	
4/23/2014 7:00	0.05				0.05	
4/23/2014 8:00	0.05				0.05	
4/23/2014 9:00	0.05				0.05	
4/23/2014 10:00	0.05				0.05	
4/23/2014 11:00	0.05				0.05	
4/23/2014 12:00	0.05				0.05	
4/23/2014 13:00	0.05				0.05	
4/23/2014 14:00	0.06				0.06	
4/23/2014 15:00	0.06				0.06	
4/23/2014 16:00	0.07				0.07	
4/23/2014 17:00	0.07				0.07	
4/23/2014 18:00	0.05				0.05	
4/23/2014 19:00	0.05				0.05	
4/23/2014 20:00	0.05				0.05	
4/23/2014 21:00	0.05				0.05	
4/23/2014 22:00	0.04			401	0.04	
4/25/2014 8:00	0.04		1	160	0.04	0.052
4/25/2014 9:00	0.05		2	162	0.05	0.052
4/25/2014 10:00	0.07		3	176	0.07	0.053
4/25/2014 11:00	0.08	S/U	4	195	0.12	0.055
4/25/2014 12:00	0.07	S/U	5	205	0.11	0.058
4/25/2014 13:00	0.08	S/U	6	224	0.12	0.061
4/25/2014 14:00	0.06	S/U	7	245	0.11	0.063
4/25/2014 15:00	0.06	S/U	8	261	0.09	0.065
4/25/2014 16:00	0.05	S/U	9	274	0.05	0.065
4/25/2014 17:00	0.05	S/U	10	285	0.04	0.065
4/25/2014 18:00	0.07	S/U	11	295	0.04	0.064
4/25/2014 19:00	0.13	S/U	12	305	0.04	0.064
4/25/2014 20:00	0.14	S/U	13	312	0.04	0.063
4/25/2014 21:00	0.17	S/U	14	315	0.04	0.063
4/25/2014 22:00	0.12			316	0.04	0.063
4/25/2014 23:00	0.11			312	0.04	0.062
4/26/2014 0:00	0.12			310	0	0.059
4/26/2014 1:00	0.11			352	0	0.056
4/26/2014 2:00	0.09	NH3 In 0336 DST		375	0	0.053
4/26/2014 3:00	0.05				0	0.051
4/26/2014 4:00	0.04				0	0.049
4/26/2014 5:00	0.04				0	0.047
4/26/2014 6:00	0.04				0	0.045
4/26/2014 7:00	0.04				0	0.043
4/26/2014 8:00	0.04				0	0.042
4/26/2014 9:00	0.04				0	0.040
4/26/2014 10:00	0.04				Total Exceedances	0

Excluded Emissions Legend	Hours Excluded
Startup (14 hours)	11
Startup (19 hours)	0
Hot Startup (2 hours)	0
Shutdown	0
Malfunction	0
Catalyst Temperature Below 375	0

Date/Time	1-Hour Online - NOx #/MMbtu	Event	Hours of Event	Temperature	14 Hour Startup	
					Valid Hour	24HR ROLL
4/30/2014 0:00	0.04				0.04	
4/30/2014 1:00	0.04				0.04	
4/30/2014 2:00	0.04				0.04	
4/30/2014 3:00	0.04				0.04	
4/30/2014 4:00	0.04				0.04	
4/30/2014 5:00	0.04				0.04	
4/30/2014 6:00	0.04				0.04	
4/30/2014 7:00	0.04				0.04	
4/30/2014 8:00	0.05				0.05	
4/30/2014 9:00	0.04				0.04	
4/30/2014 10:00	0.04				0.04	
4/30/2014 11:00	0.04				0.04	
4/30/2014 12:00	0.04				0.04	
4/30/2014 13:00	0.04				0.04	
4/30/2014 14:00	0.04				0.04	
4/30/2014 15:00	0.04				0.04	
4/30/2014 16:00	0.04				0.04	
4/30/2014 17:00	0.04				0.04	
4/30/2014 18:00	0.04				0.04	
4/30/2014 19:00	0.04				0.04	
4/30/2014 20:00	0.04				0.04	
4/30/2014 21:00	0.04				0.04	
4/30/2014 22:00	0.04				0.04	
4/30/2014 23:00	0.03				0.03	
5/1/2014 0:00	0.04				0.04	
5/13/2014 15:00	0		1	91	0	0.038
5/13/2014 16:00	0		2	91	0	0.037
5/13/2014 17:00	0.05		3	94	0.05	0.037
5/13/2014 18:00	0.07		4	108	0.07	0.038
5/13/2014 19:00	0.03		5	118	0.03	0.038
5/13/2014 20:00	0.06		6	132	0.06	0.039
5/13/2014 21:00	0.04		7	143	0.04	0.039
5/13/2014 22:00	0.06		8	159	0.06	0.039
5/13/2014 23:00	0.08	S/U	9	177	0.09	0.041
5/14/2014 0:00	0.09	S/U	10	198	0.15	0.046
5/14/2014 1:00	0.08	S/U	11	225	0.08	0.048
5/14/2014 2:00	0.07	S/U	12	252	0.11	0.050
5/14/2014 3:00	0.09	S/U	13	271	0.11	0.053
5/14/2014 4:00	0.11	S/U	14	283	0.1	0.056
5/14/2014 5:00	0.09			291	0.07	0.057
5/14/2014 6:00	0.15			305	0.06	0.058
5/14/2014 7:00	0.08			307	0.05	0.058
5/14/2014 8:00	0.11			343	0.05	0.059
5/14/2014 9:00	0.11			369	0.04	0.059
5/14/2014 10:00	0.1			374	0.04	0.059
5/14/2014 11:00	0.07	NH3 In 1158 DST		382	0.04	0.059
5/14/2014 12:00	0.06				0.04	0.059
5/14/2014 13:00	0.05				0.04	0.059
5/14/2014 14:00	0.05				0.03	0.059
5/14/2014 15:00	0.04				0.03	0.060
5/14/2014 16:00	0.04				0.04	0.062
5/14/2014 17:00	0.04				0.04	0.061
5/14/2014 18:00	0.04				Total Exceedances	0
5/14/2014 19:00	0.04					
5/14/2014 20:00	0.03					
5/14/2014 21:00	0.03					
5/14/2014 22:00	0.04					
5/14/2014 23:00	0.04					
5/15/2014 0:00	0.06					
5/15/2014 1:00	0.08					
5/15/2014 2:00	0.05					
5/15/2014 3:00	0.04					
5/15/2014 4:00	0.04					
5/15/2014 5:00	0.04					
5/15/2014 6:00	0.04					
5/15/2014 7:00	0.05					

Excluded Emissions Legend	Hours Excluded
Startup (14 hours)	6
Startup (19 hours)	0
Hot Startup (2 hours)	0
Shutdown	0
Malfunction	0
Catalyst Temperature Below 375	0

Date/Time	1-Hour Online - NOx #/MMbtu	Event	Hours of Event	Temperature	2 Hour Hot Startup & 2 Hour Malfunction Exclusion		Emissions Excluded when Catalyst Temp. below 375	
					Valid Hour	24HR ROLL	Valid Hour	24HR ROLL
5/26/2014 17:00	0.06				0.06		0.06	
5/26/2014 18:00	0.06				0.06		0.06	
5/26/2014 19:00	0.06				0.06		0.06	
5/26/2014 20:00	0.06				0.06		0.06	
5/26/2014 21:00	0.06				0.06		0.06	
5/26/2014 22:00	0.06				0.06		0.06	
5/26/2014 23:00	0.06				0.06		0.06	
5/27/2014 0:00	0.06				0.06		0.06	
5/27/2014 1:00	0.06				0.06		0.06	
5/27/2014 2:00	0.06				0.06		0.06	
5/27/2014 3:00	0.05				0.05		0.05	
5/27/2014 4:00	0.03				0.03		0.03	
5/27/2014 5:00	0.09				0.09		0.09	
5/27/2014 6:00	0.07				0.07		0.07	
5/27/2014 7:00	0.07				0.07		0.07	
5/27/2014 8:00	0.07				0.07		0.07	
5/27/2014 9:00	0.06				0.06		0.06	
5/27/2014 10:00	0.08				0.08		0.08	
5/27/2014 11:00	0.06				0.06		0.06	
5/27/2014 12:00	0.06				0.06		0.06	
5/27/2014 13:00	0.06				0.06		0.06	
5/27/2014 14:00	0.06				0.06		0.06	
5/27/2014 15:00	0.06				0.06		0.06	
5/27/2014 16:00	0.06				0.06		0.06	
5/27/2014 17:00	0.06				0.06		0.06	
5/27/2014 18:00	0.05				0.05		0.05	
5/27/2014 19:00	0.07			398	0.07	0.062	0.07	0.062
5/27/2014 20:00	0.15	HOT	1	368	0	0.059	0.07	0.062
5/27/2014 21:00	0			345	0.09	0.060	0.05	0.062
5/27/2014 22:00	0.26	HOT	2	329	0.09	0.062	0.05	0.061
5/27/2014 23:00	0.2	MALF	1	314	0.1	0.063	0.05	0.061
5/28/2014 0:00	0.18	MALF	2	302	0.07	0.064	0.06	0.061
5/28/2014 1:00	0.09			296	0.05	0.063	0.06	0.061
5/28/2014 2:00	0.09			308	0.05	0.063	0.06	0.061
5/28/2014 3:00	0.1			359	0.05	0.063	0.06	0.061
5/28/2014 4:00	0.07	NH3 In 0513 DST		378	0.06	0.064	0.06	0.063
5/28/2014 5:00	0.05				0.06	0.063	0.06	0.061
5/28/2014 6:00	0.05				0.06	0.063	0.06	0.061
5/28/2014 7:00	0.05				0.06	0.062	0.06	0.060
5/28/2014 8:00	0.06				0.06	0.062	0.06	0.060
5/28/2014 9:00	0.06				0.06	0.062	0.06	0.060
5/28/2014 10:00	0.06				0.06	0.061	0.06	0.059
5/28/2014 11:00	0.06				0.06	0.061	0.06	0.059
5/28/2014 12:00	0.06				0.06	0.061	0.06	0.059
5/28/2014 13:00	0.06				0.06	0.061	0.06	0.059
5/28/2014 14:00	0.06				0.06	0.061	0.06	0.059
5/28/2014 15:00	0.06				0.06	0.061	0.06	0.059
5/28/2014 16:00	0.06				0.06	0.061	0	0.057
5/28/2014 17:00	0.06				0.06	0.061	0	0.054
5/28/2014 18:00	0.06				0.06	0.061	0	0.052
5/28/2014 19:00	0.06				0.06	0.061	0	0.049
5/28/2014 20:00	0.06						0	0.046
5/28/2014 21:00	0.06						0	0.044
5/28/2014 22:00	0.06						0	0.042
5/28/2014 23:00	0.06				Total Exceedances	0		0

Excluded Emissions Legend	Hours Excluded
Startup (14 hours)	0
Startup (19 hours)	0
Hot Startup (2 hours)	2
Shutdown	0
Malfunction	2
Catalyst Temperature Below 375	4

Date/Time	1-Hour Online - NOx #/MMbtu	Event	Hours of Event	Temperature	2 Hour Hot Startup, 2 Hour Malfunction Exclusion & 19 Hour Startup			Emissions Excluded when Catalyst Temp. below 375	
					Valid Hour	24HR ROLL		Valid Hour	24HR ROLL
6/4/2014 0:00	0.06				0.06			0.060	
6/4/2014 1:00	0.06				0.06			0.060	
6/4/2014 2:00	0.06				0.06			0.060	
6/4/2014 3:00	0.06				0.06			0.060	
6/4/2014 4:00	0.06				0.06			0.060	
6/4/2014 5:00	0.06				0.06			0.060	
6/4/2014 6:00	0.06				0.06			0.060	
6/4/2014 7:00	0.06				0.06			0.060	
6/4/2014 8:00	0.07				0.07			0.070	
6/4/2014 9:00	0.06				0.06			0.060	
6/4/2014 10:00	0.07				0.07			0.070	
6/4/2014 11:00	0.07				0.07			0.070	
6/4/2014 12:00	0.07				0.07			0.070	
6/4/2014 13:00	0.06				0.06			0.060	
6/4/2014 14:00	0.05				0.05			0.050	
6/4/2014 15:00	0.06				0.06			0.060	
6/4/2014 16:00	0.06				0.06			0.060	
6/4/2014 17:00	0.06				0.06			0.060	
6/4/2014 18:00	0.06				0.06			0.060	
6/4/2014 19:00	0.06				0.06			0.060	
6/4/2014 20:00	0.06				0.06			0.060	
6/4/2014 21:00	0.06				0.06			0.060	
6/4/2014 22:00	0.06				0.06			0.060	
6/4/2014 23:00	0.06				0.06			0.060	
6/5/2014 0:00	0.06				0.06			0.060	
6/5/2014 1:00	0.06				0.06			0.060	
6/5/2014 2:00	0.06				0.06			0.060	
6/5/2014 3:00	0.06				0.06			0.060	
6/5/2014 4:00	0.06				0.06			0.060	
6/5/2014 5:00	0.06				0.06			0.060	
6/5/2014 6:00	0.06				0.06			0.060	
6/5/2014 7:00	0.06				0.06			0.060	
6/5/2014 8:00	0.06				0.06			0.060	
6/5/2014 9:00	0.06				0.06			0.060	
6/5/2014 10:00	0.06				0.06			0.060	
6/5/2014 11:00	0.06				0.06			0.060	
6/5/2014 12:00	0.05				0.05			0.050	
6/5/2014 13:00	0.06				0.06			0.060	
6/5/2014 14:00	0.06				0.06			0.060	
6/5/2014 15:00	0.06				0.06			0.060	
6/5/2014 16:00	0.06				0.06			0.060	
6/5/2014 17:00	0.06				0.06			0.060	
6/5/2014 18:00	0.06				0.06			0.060	
6/5/2014 19:00	0.06				0.06			0.060	
6/5/2014 20:00	0.06				0.06			0.060	
6/5/2014 21:00	0.06			400	0.06			0.060	
6/5/2014 22:00	0.02			398	0.02	0.058		0.020	0.058
6/5/2014 23:00	0.2	MALF	1	363	0.31	0.068		0.110	0.060
6/6/2014 0:00	0.28	MALF	2	342	0.3	0.078		0.080	0.061
6/6/2014 1:00	0.3	HOT	1	330	0.31	0.089		0.070	0.061
6/6/2014 2:00	0.31	MALF	1	323	0.21	0.095		0.050	0.061
6/6/2014 3:00	0.3	MALF	2	317	0.12	0.098		0.050	0.060
6/6/2014 4:00	0.31			312	0.11	0.100		0.050	0.060
6/6/2014 5:00	0.3			310	0.08	0.100		0.050	0.060
6/6/2014 6:00	0.31			306	0.07	0.101		0.050	0.059
6/6/2014 7:00	0.31	HOT	1	314	0.05	0.100		0.060	0.059
6/6/2014 8:00	0.3	HOT	2	330	0.05	0.100		0.060	0.059
6/6/2014 9:00	0.21			338	0.05	0.100		0.060	0.059
6/6/2014 10:00	0.12			335	0.05	0.099		0.060	0.059
6/6/2014 11:00	0.11	NH3 In 1248 DST		378	0.05	0.099		0.060	0.059
6/6/2014 12:00	0.08			413	0.06	0.099		0.060	0.060
6/6/2014 13:00	0.07				0.06	0.099		0.060	0.060
6/6/2014 14:00	0.08	S/D	1		0.06	0.099		0.060	0.060
6/6/2014 15:00	0.07	S/D	2		0.06	0.099		0.060	0.060
6/6/2014 16:00	0.09	S/D	3		0.06	0.099		0.060	0.060
6/7/2014 2:00	0.05	S/U	1	274	0.06	0.099		0.060	0.060
6/7/2014 3:00	0.1	S/U	2	277	0.06	0.099		0.060	0.060
6/7/2014 4:00	0.1	S/U	3	292	0.06	0.099		0.060	0.060
6/7/2014 5:00	0.11	S/U	4	296	0.06	0.099		0.060	0.060
6/7/2014 6:00	0.25	S/U	5	303	0.06	0.099		0.060	0.060
6/7/2014 7:00	0.15	S/U	6	313	0.06	0.101		0.060	0.061
6/7/2014 8:00	0.1	S/U	7	307	0.06	0.090		0.060	0.059
6/7/2014 9:00	0.11	S/U	8	307	0.06	0.080		0.060	0.058
6/7/2014 10:00	0.11	S/U	9	330	0.06	0.070		0.060	0.058
6/7/2014 11:00	0.09	S/U	10	365	0.06	0.064		0.060	0.058
6/7/2014 12:00	0.05	NH3 In 1216 DST	11	387	0.06	0.061		0.060	0.059
6/7/2014 13:00	0.05		12					0.060	0.059
6/7/2014 14:00	0.05		13					0.060	0.060
6/7/2014 15:00	0.05		14					0.060	0.060
6/7/2014 16:00	0.06		15					0.060	0.060
6/7/2014 17:00	0.06		16					0.060	0.060
6/7/2014 18:00	0.06		17					0.060	0.060
6/7/2014 19:00	0.06		18					0.060	0.060
6/7/2014 20:00	0.06		19					0.060	0.060
6/7/2014 21:00	0.06							0.060	0.060
6/7/2014 22:00	0.06							0.060	0.060
6/7/2014 23:00	0.06							0.060	0.060
6/8/2014 0:00	0.06							0.060	0.060
6/8/2014 1:00	0.06							0.060	0.060
6/8/2014 2:00	0.06							0.060	0.060
6/8/2014 3:00	0.06							0.060	0.060
6/8/2014 4:00	0.06							0.060	0.060
6/8/2014 5:00	0.06							0.060	0.060
6/8/2014 6:00	0.06							0.000	0.058
6/8/2014 7:00	0.06				Total Exceedances	25			0
					Maximum	0.101			

Excluded Emissions Legend	Hours Excluded
Startup (14 hours)	0
Startup (19 hours)	9
Hot Startup (2 hours)	3
Shutdown	3
Malfunction	4
Catalyst Temperature Below 375	5

Date/Time	1-Hour Online - NOx #/MMbtu	Event	Hours of Event	Temperature	19 Hour Startup	
					Valid Hour	24HR ROLL
6/16/2014 12:00	0.06				0.06	
6/16/2014 13:00	0.06				0.06	
6/16/2014 14:00	0.06				0.06	
6/16/2014 15:00	0.06				0.06	
6/16/2014 16:00	0.06				0.06	
6/16/2014 17:00	0.06				0.06	
6/16/2014 18:00	0.06				0.06	
6/16/2014 19:00	0.06				0.06	
6/16/2014 20:00	0.06				0.06	
6/16/2014 21:00	0.06				0.06	
6/16/2014 22:00	0.06				0.06	
6/16/2014 23:00	0.06				0.06	
6/17/2014 0:00	0.06				0.06	
6/17/2014 1:00	0.06				0.06	
6/17/2014 2:00	0.06				0.06	
6/17/2014 3:00	0.06				0.06	
6/17/2014 4:00	0.06				0.06	
6/17/2014 5:00	0.06				0.06	
6/17/2014 6:00	0.06				0.06	
6/17/2014 7:00	0.06				0.06	
6/17/2014 8:00	0.06				0.06	
6/17/2014 9:00	0.03				0.03	
6/17/2014 10:00	0.13	S/D	1		0.05	
6/20/2014 10:00	0.57	S/U	1	132	0.05	0.058
6/20/2014 11:00	0.06	S/U	2	147	0.05	0.058
6/20/2014 12:00	0.07	S/U	3	167	0.05	0.057
6/20/2014 13:00	0.08	S/U	4	180	0.06	0.057
6/20/2014 14:00	0.1	S/U	5	195	0.06	0.057
6/20/2014 15:00	0.23	S/D	1	212	0.06	0.057
6/21/2014 12:00	0.07	S/U	1	161	0.06	0.057
6/21/2014 13:00	0.05	S/U	2	173	0.06	0.057
6/21/2014 14:00	0.08	S/U	3	186	0.06	0.057
6/21/2014 15:00	0.08	S/U	4	198	0.06	0.057
6/21/2014 16:00	0.08	S/U	5	211	0.06	0.057
6/21/2014 17:00	0.1	S/U	6	232	0.06	0.057
6/21/2014 18:00	0.1	S/U	7	262	0.06	0.057
6/21/2014 19:00	0.1	S/U	8	286	0.06	0.057
6/21/2014 20:00	0.11	S/U	9	296	0.06	0.057
6/21/2014 21:00	0.26	S/U	10	308	0.06	0.057
6/21/2014 22:00	0.22	S/U	11	307	0.06	0.057
6/21/2014 23:00	0.17	S/U	12	311	0.06	0.057
6/22/2014 0:00	0.14	S/U	13	320	0.06	0.057
6/22/2014 1:00	0.09	S/U	14	324	0.06	0.057
6/22/2014 2:00	0.08	S/U	15	355	0	0.055
6/22/2014 3:00	0.07	NH3 In 0414 DST	16	377	0	0.052
6/22/2014 4:00	0.05		17		0	0.051
6/22/2014 5:00	0.05		18		0	0.049
6/22/2014 6:00	0.05		19		0	0.047
6/22/2014 7:00	0.05				0	0.045
6/22/2014 8:00	0.06				Total Exceedances	0

Excluded Emissions Legend	Hours Excluded
Startup (14 hours)	0
Startup (19 hours)	21
Hot Startup (2 hours)	0
Shutdown	2
Malfunction	0
Catalyst Temperature Below 375	0

Date/Time	1-Hour Online - NOx #/MMbtu	Event	Hours of Event	Temperature	19 Hour Startup	
					Valid Hour	24HR ROLL
6/28/2014 0:00	0.06				0.06	
6/28/2014 1:00	0.06				0.06	
6/28/2014 2:00	0.06				0.06	
6/28/2014 3:00	0.06				0.06	
6/28/2014 4:00	0.06				0.06	
6/28/2014 5:00	0.06				0.06	
6/28/2014 6:00	0.06				0.06	
6/28/2014 7:00	0.06				0.06	
6/28/2014 8:00	0.06				0.06	
6/28/2014 9:00	0.06				0.06	
6/28/2014 10:00	0.06				0.06	
6/28/2014 11:00	0.06				0.06	
6/28/2014 12:00	0.06				0.06	
6/28/2014 13:00	0.06				0.06	
6/28/2014 14:00	0.06				0.06	
6/28/2014 15:00	0.06				0.06	
6/28/2014 16:00	0.06				0.06	
6/28/2014 17:00	0.06				0.06	
6/28/2014 18:00	0.06				0.06	
6/28/2014 19:00	0.06				0.06	
6/28/2014 20:00	0.06				0.06	
6/28/2014 21:00	0.06				0.06	
6/28/2014 22:00	0.06				0.06	0.060
6/28/2014 23:00	0.06				0.06	0.060
6/29/2014 0:00	0.06				0.06	0.060
6/29/2014 1:00	0.06				0.06	0.060
6/29/2014 2:00	0.06				0.06	0.060
6/29/2014 3:00	0.06				0.06	0.060
6/29/2014 4:00	0.06				0.06	0.060
6/29/2014 5:00	0.05				0.05	0.060
6/29/2014 6:00	0.08			382	0.08	0.060
6/29/2014 7:00	0.08	S/D	1	357	0	0.058
6/29/2014 8:00	0.08	S/D	2	341	0.06	0.058
6/29/2014 9:00	0	Down		326	0.05	0.058
6/29/2014 10:00	0	Down		314	0.05	0.057
6/29/2014 11:00	0	Down		302	0.06	0.057
6/29/2014 12:00	0	Down		293	0.06	0.057
6/29/2014 13:00	0	Down		284	0.06	0.057
6/29/2014 14:00	0	Down		275	0.06	0.057
6/29/2014 15:00	0	Down		268	0	0.055
6/29/2014 16:00	0	S/U	1	261	Total Exceedances	0
6/29/2014 17:00	0.08	S/U	2	275		
6/29/2014 18:00	0.09	S/U	3	307		
6/29/2014 19:00	0.21	S/U	4	325		
6/29/2014 20:00	0.12	S/U	5	320		
6/29/2014 21:00	0.1	S/U	6	317		
6/29/2014 22:00	0.09	S/U	7	315		
6/29/2014 23:00	0.11	S/U	8	334		
6/30/2014 0:00	0.09	NH3 In 0134 DST	9	375		
6/30/2014 1:00	0.06		10			
6/30/2014 2:00	0.05		11			
6/30/2014 3:00	0.05		12			
6/30/2014 4:00	0.06		13			
6/30/2014 5:00	0.06		14			
6/30/2014 6:00	0.06		15			
6/30/2014 7:00	0.06		16			

Excluded Emissions Legend	Hours Excluded
Startup (14 hours)	0
Startup (19 hours)	8
Hot Startup (2 hours)	0
Shutdown	2
Malfunction	0
Catalyst Temperature Below 375	0

Attachment B
Lessons Learned

Examples of lessons learned from events leading to NO_x emissions over .070lb/MMBtu

1. The boiler receives fuel from two sides. When the fuel feed system on one side has a problem, the plant can remain on line while receiving fuel from one side. We have learned that doing so successfully requires the operator to make adjustments to fuel and air flow settings. We have captured these adjustments and use our unit simulator to train other operators on how to handle that situation.
2. All of our large boiler fans have vibration monitoring equipment that was installed to stop the fan if vibration over a certain level was detected. This, in turn, will cause the unit to trip off line. One trip was caused by a faulty cable. We have since modified the vibration monitoring equipment so that it warns the operator of vibration, but does not stop the fan.
3. During the these first seven months of plant operation, there have been ten other instances leading to plant trips in addition to the two above. Not all resulted in NO_x exceedances, but they had the potential to do so. We have addressed all events with system improvements, repairs, or training, as appropriate. Almost all of the events, excluding a lightning strike, were events of the type that are typically experienced in the first year of a power plant's operation. We have addressed them, and expect them to become far less frequent.