

DRAFT

[ISSUE DATE]

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
(xxxxxxxxxxxxxxxxxxxx)

19-[xxx]E CAB
File No. 0087

Mr. Steven Barnoski
Plant Manager
AES Hawaii, LLC
91-086 Kaomi Loop
Kapolei, Hawaii 96707-1883

Dear Mr. Barnoski:

**SUBJECT: Amendment of Covered Source Permit (CSP) No. 0087-02-C
Application for Significant Modification No. 0087-09
AES Hawaii, LLC
203 MW Coal-Fired Cogeneration Plant
Located At: 91-086 Kaomi Loop, Kapolei, Oahu
Date of Expiration: April 15, 2019 (Expiration date to be revised upon
issuance of CSP No. 0087-02-C renewal)**

In accordance with Hawaii Administrative Rules (HAR), Chapter 11-60.1, and pursuant to your application for a significant modification received on March 28, 2018, and updated greenhouse gas (GHG) emission reduction plan received on October 30, 2018, the Department of Health, Clean Air Branch (herein after referred to as Department), amends CSP No. 0087-02-C issued to AES Hawaii, LLC, on April 16, 2014, and amended on June 23, 2014.

In accordance with HAR Chapter 11-60.1, Subchapter 11, the amendment incorporates provisions for partnering the AES Hawaii, LLC, cogeneration plant with other affected plants to combine emissions for flexibility in achieving GHG reductions. Individual and total combined GHG emission caps established in each facility's GHG emission reduction plan are incorporated in the amendment with associated provisions pursuant to HAR §11-60.1-204(d)(6)(C). The partnering facilities included in this amendment are:

A. Independent Power Producers (IPPs)

- 1) AES Hawaii, LLC (AES), CSP No. 0087-02-C
- 2) Hamakua Energy, LLC (Hamakua Energy), CSP No. 0243-01-C
- 3) Kalaeloa Partners, L.P. (KPLP), CSP No. 0214-01-C

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B. Hawaiian Electric Companies

- 1) Hawaiian Electric Company, Inc. (HECO), CSP No. 0548-0-C
- 2) Hawaiian Electric Company, Inc. (HECO), CSP No. 0238-01-C
- 3) Hawaiian Electric Company, Inc. (HECO), CSP No. 0239-01-C
- 4) Hawaiian Electric Company, Inc. (HECO), CSP No. 0240-01-C
- 5) Hawaii Electric Light Company, Inc. (HELCO), CSP No. 0007-01-C
- 6) Hawaii Electric Light Company, Inc. (HELCO), CSP No. 0234-01-C
- 7) Hawaii Electric Light Company, Inc. (HELCO), CSP No. 0235-01-C
- 8) Maui Electric Company, Ltd. (MECO), CSP No. 0031-04-C
- 9) Maui Electric Company, Ltd. (MECO), CSP No. 0067-01-C
- 10) Maui Electric Company, Ltd. (MECO), CSP No. 0232-01-C

The three (3) IPP permits and CSP No. 0548-01-C (HECO Campbell Industrial Park (CIP) Generating Station) will specify individual and total combine GHG emission caps established for all of the partnering facilities. Any GHG emission cap revision will require each of these facilities (AES, Hamakua Energy, KPLP, and HECO CIP) to submit a significant permit modification.

The permits for the remaining partnering facilities operated by HECO, HELCO, and MECO will not specify individual and total combine GHG emission caps, but will reference GHG emission caps included in CSP No. 0548-01-C. Designating CSP No. 0548-01-C as the main HECO permit will reduce the burden of modifying all Hawaiian Electric Companies' permits should an emission cap be revised. Only CSP No. 0548-01-C would require modification as the emission caps will not be incorporated separately into each facility's permit.

CSP No. 0087-02-C issued on April 16, 2014, and amended on June 23, 2014, is amended as follows:

1) Added Attachment and Form:

- a) Attachment II - GHG: Special Conditions – GHG Reduction Requirements
- b) Monitoring Report Form: GHG Emissions

2) Superseded Attachment:

- a) Attachment III: Annual Fee Requirements

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3) Superseded Condition:

a) Attachment I: Standard Condition No. 28:

28. **Any document (including reports) required to be submitted by this permit shall be certified as being true, accurate, and complete by a responsible official in accordance with HAR, Sections 11-60.1-1 and 11-60.1-4, and shall be mailed to the following address:**

**State of Hawaii
Clean Air Branch
2827 Waimano Home Road, #130
Pearl City, HI 96782**

Upon request and as required by this permit, all correspondence to the State of Hawaii Department of Health associated with this Covered Source Permit shall have duplicate copies forwarded to:

**Manager
Enforcement Division, Air Section
U.S. Environment Protection Agency, Region 9
75 Hawthorne Street, ENF-2-1
San Francisco, CA 94105**

All other permit conditions of CSP No. 0087-02-C issued on April 16, 2014, and amended on June 23, 2014, shall not be affected and shall remain valid.

If there are any questions regarding these matters, please contact Mr. Michael Madsen of the Clean Air Branch at (808) 586-4200.

Sincerely,

_____, P.E., ACTING CHIEF
Environmental Management Division

MM:rg

Enclosures

**ATTACHMENT II - GHG: SPECIAL CONDITIONS
GHG REDUCTION REQUIREMENTS
COVERED SOURCE PERMIT NO. 0087-02-C**

Amended Date:

Expiration Date: April 15, 2019

(Expiration date to be revised upon issuance of permit renewal)

In addition to the standard conditions of the Covered Source Permit, the following special conditions shall apply to the permitted facility.

Section A. Equipment Description

1. Attachment II - GHG of this permit encompasses the following equipment and associated appurtenances:

Equipment	Manufacturer	Capacity
Circulating Fluidized Bed Boiler A with Limestone Injection	Ahlstrom Pyropower Corporation	2,150 MMBtu/hr (see note a)
Circulating Fluidized Bed Boiler B with Limestone Injection	Ahlstrom Pyropower Corporation	
Limestone Dryer 1A	Micro Powder Systems	4.75 MMBtu/hr
Limestone Dryer 1B	Micro Powder Systems	4.75 MMBtu/hr

^a Total combined capacity of Boilers A and B

(Auth.: HAR §11-60.1-3)

2. The equipment is subject to GHG emission reduction requirements of HAR, Chapter 11-60.1, Subchapter 11, and associated permit conditions based on information from the GHG emission reduction plan and permit application for significant modification. The GHG emission reduction plan shall become a part of the covered source permit application process for renewals and any required modifications pursuant to HAR Chapter 11-60.1, Subchapter 5. With each subsequent GHG emission reduction plan submittal, the permittee shall report:

- a. The GHG emission reduction status;
- b. Factors contributing to the emission changes;
- c. Any control measure updates; and
- d. Any new developments or changes that would affect the basis of the facility-wide GHG emissions cap.

(Auth.: HAR §11-60.1-5, §11-60.1-204(g))

Section B. GHG Permit Conditions

1. Permit conditions specified in Attachment II – GHG, including provisions to limit maximum potential GHG emissions, are state-only enforceable requirements which are not federally enforceable under the federal Clean Air Act.

(Auth.: HAR §11-60.1-3, §11-60.1-90, 11-60.1-161; 40 CFR §70.6)¹

2. The permittee shall comply with all applicable provisions of these conditions, including all emission limits, notification, testing, monitoring, and reporting requirements. The major requirements of these provisions are detailed in the special conditions of this attachment.

(Auth.: HAR §11-60.1-3, §11-60.1-90, 11-60.1-161)¹

Section C. GHG Emission Limitations

1. GHG Emission Caps

- a. Each partnering facility shall not emit or cause to be emitted carbon dioxide equivalent (CO₂e) emissions in excess of the following individual caps, except as specified in Attachment II - GHG, Special Condition No. C.1.c.iv:

Generating Station	CSP Permit No.	CO ₂ e Emission Cap	
		Metric Tons per Calendar Year ^a	Short Tons per Calendar Year
AES Hawaii, LLC Cogeneration Plant	0087-02-C	1,534,598	1,691,605
Hamakua Energy, LLC Cogeneration Plant	0243-01-C	139,433	153,699
Kalaeloa Partners, L.P. Cogeneration Plant	0214-01-C	993,198	1,094,813
HECO Campbell Industrial Park Generating Station	0548-01-C	48,752	53,740
HECO Honolulu Generating Station	0238-01-C	0	0
HECO Kahe Generating Station	0240-01-C	1,935,707	2,133,752
HECO Waiiau Generating Station	0239-01-C	733,265	808,286
HELCO Kanoelehua-Hill Generating Station	0234-01-C	156,449	172,456
HELCO Keahole Generating Station	0007-01-C	219,727	242,208
HELCO Puna Generating Station	0235-01-C	28,800	31,747
MECO Kahului Generating Station	0232-01-C	140,281	154,633
MECO Maalaea Generating Station	0067-01-C	417,182	459,864
MECO Palaau Generating Station	0031-04-C	23,999	26,454

^a Metric Tons = (0.90718474) x (Short Tons)

- b. All partnering facilities shall not emit or cause to be emitted total combined CO₂e emissions in excess of 6,371,392 metric tons (7,023,258 short tons) per calendar year.
- c. For purposes of the CO₂e emission limits in Attachment II - GHG, Special Condition Nos. C.1.a and C.1.b:
 - i. The CO₂e emissions shall have the same meaning as that specified in HAR §11-60.1-1;
 - ii. In accordance with HAR §11-60.1-204(d)(6)(B), biogenic carbon dioxide (CO₂) emissions shall not be included when determining compliance with the emissions limit;
 - iii. The permittee shall be in compliance with the emissions limits by the end of 2019 and each calendar year thereafter;
 - iv. The permittee may exceed the emissions cap specified in Attachment II - GHG, Special Condition No. C.1.a, if the GHG emissions limit specified in Attachment II - GHG, Special Condition No. C.1.b is met; and
 - v. At no time shall the permittee exceed Attachment II - GHG, Special Condition Nos. C.1.a and C.1.b simultaneously over a calendar year. For incidences when Attachment II - GHG, Special Condition Nos. C.1.a and C.1.b, are exceeded simultaneously, emissions in excess of the total combined cap shall be allocated according to the following equation for compliance purposes:

$$X = XG \frac{(A - C)}{\sum_{A_i > C_i} (A_i - C_i)}$$

Where:

X = Adjusted portion in metric tons or short tons of GHG emissions that are in excess of total combined cap specified in Attachment II – GHG, Special Condition No. C.1.b. The equation applies to all affected facilities that do not meet the individual and total combined GHG emission caps specified in Attachment II – GHG, Special Condition Nos. C.1.a and C.1.b, respectively.

XG = Total combined actual GHG emissions from affected facilities minus total combined GHG emissions cap. The total combined emissions cap shall be sixteen percent (16%) below the total combined baseline emission level less biogenic CO₂ emissions.

A = Actual GHG emissions from the affected facility.

C = GHG emissions cap for the affected facility.

$\sum_{A_i > C_i} (A_i - C_i)$ = The sum of the difference between the actual emissions and cap emissions for all facilities that did not achieve the individual facility-wide GHG emissions cap.

(Auth.: HAR §11-60.1-3, §11-60.1-90, §11-60.1-204)

2. GHG Emission Cap Revisions

- a. The facility-wide GHG emissions cap may be re-evaluated and revised by the Department in accordance with HAR §11-60.1-204(h).

- b. Any revision to the facility-wide GHG emissions cap shall be considered a significant modification subject to the application and review requirements of HAR §11-60.1-104. For each GHG emission cap revision, the Department may impose additional emission limits or requirements, or limit the time-frame allowed for the revised GHG emissions cap.

(Auth.: HAR §11-60.1-3, §11-60.1-90, §11-60.1-204)

Section D. Monitoring and Record Keeping Requirements

1. GHG Emissions

For calculating CO₂e emissions to assess fees, determining compliance with the GHG emission caps, and quality assurance/quality control requirements, the permittee shall:

- a. Monitor the CO₂ mass emissions data for the stationary source combustion units listed in Attachment II – GHG, Special Condition No. A.1, in accordance with 40 CFR §98.34;
- b. Estimate missing data in accordance with the applicable procedures in 40 CFR §98.35;
- c. Determine the metric tons of CO₂, methane (CH₄), and nitrous oxide (N₂O) in accordance with 40 CFR §98.33;
- d. For measuring CO₂ mass emissions from the boilers with the Tier 4 calculation methodology, use EPA Reference Method 2F during each relative accuracy test audit (RATA) performed to quality assure the continuous monitoring system (CEMS) exhaust flow meter of each boiler;
- e. Correct the EPA Method 2F flow results obtained during each RATA with the established wall-effects adjustment factor (WAF);
- f. Conduct the CEMS exhaust flow meter RATA using the same number of traverse points as that used to determine the WAF;
- g. Identify, at a minimum, in the RATA reports, the test results, test methods, test locations, parameters evaluated, CEMS analyzer descriptions, WAF values including the number of traverse points used to determine the WAF and the number of traverse points used for EPA Method 2F, boiler operating load (MMBtu/hr), and the types and rates of fuel combusted including the associated certificate and analysis, or equivalent, of the coal combusted;
- h. Maintain records on the CEMS exhaust flow meter K-Factor(s) (flow correction multiplier and polynomial), WAF, and dilution ratio correction algorithm details for each boiler;
- i. Calculate the GHG emissions, expressed in metric tons of CO₂e, using Equation A-1 of 40 CFR §98.2;
- j. Convert the metric tons of CO₂e emissions to short tons for monitoring and annual emissions reporting, as applicable. For the conversion, one (1) short ton is equal to 0.90718474 metric tons;

- k. Maintain the certificate of sampling and analysis, or equivalent, of the coal supplied that provides, at a minimum, the coal moisture content, ash content, and carbon content (dry ash free basis), date of receiving the coal shipment, and the amount of coal supplied (e.g., short tons, metric tons, long tons, etc.);
- l. Maintain records on the short tons of limestone sorbent used for each boiler using measurements from a non-resetting weigh scale for the continuous and permanent recording of the amount of limestone fed to the boilers; and
- m. Obtain CO₂e emissions data from all other partnering facilities to report the total combined CO₂e emissions in accordance with Attachment II - GHG Special Condition No. E.4.

(Auth.: HAR §11-60.1-3, §11-60.1-90; 40 CFR §98.2, §98.33, §98.34, §98.35, §98.6)

2. Records

All records, including support information, shall be maintained for **at least five (5) years** from the date of the monitoring sample, measurement, test, report, or applications. Support information includes all maintenance, inspection, and repair records, and copies of all reports required by this permit. These records shall be true, accurate, and maintained in a permanent form suitable for inspection and be made available to the Department or authorized representative(s) upon request.

(Auth.: HAR §11-60.1-3, §11-60.1-11, §11-60.1-90)

Section E. Notification and Reporting Requirements

1. Standard Condition Reporting

Notification and reporting pertaining to the following events shall be done in accordance with Attachment I, Standard Condition Nos. 17 and 24, respectively:

- a. Emissions of air pollutants in violation of HAR, Chapter 11-60.1 or this permit (excluding technology-based emission exceedances due to emergencies); and
- b. Permanent discontinuance of construction, modification, relocation, or operation of the facility covered by this permit.

(Auth.: HAR §11-60.1-8, §11-60.1-15, §11-60.1-16, §11-60.1-90; SIP §11-60-10, SIP §11-60-16)²

2. Deviations

- a. Except as specified in Attachment II - GHG, Special Condition No. E.2.b, the permittee shall report in writing **within five (5) working days** any deviations from permit requirements, including those attributed to upset conditions, the probable cause of such deviations, and any corrective actions or preventive measures taken. Corrective actions may include a requirement for testing, or more frequent monitoring, or could trigger implementation of a corrective action plan.
- b. The permittee shall report, in writing, deviations from Attachment II – GHG, Special Condition No. C.1.c.v, the probable cause of such deviations, and any corrective actions or preventive measures taken. Corrective actions may include a requirement for testing, more frequent monitoring, or could trigger implementation of a corrective action plan. Reports shall be submitted **within sixty (60) days** following the end of each calendar year.

(Auth.: HAR §11-60.1-3, §11-60.1-15, §11-60.1-16, §11-60.1-90)

3. Compliance Certification

- a. During the permit term, the permittee shall submit at least **annually** to the Department and U.S. EPA, Region 9, the attached **Compliance Certification Form** pursuant to HAR, Subsection 11-60.1-86. The permittee shall indicate whether or not compliance is being met with each term or condition of this permit. For making this certification for the partnering facility conditions in Attachment II – GHG, the permittee is relying on information provided by other partners that these partners independently certify. The compliance certification shall include, at a minimum, the following information:
 - i. The identification of each term or condition of the permit that is the basis of the certification;
 - ii. The compliance status;
 - iii. Whether compliance was continuous or intermittent;
 - iv. The methods used for determining the compliance status of the source currently and over the reporting period;
 - v. Any additional information indicating the source's compliance status with any applicable enhanced monitoring and compliance certification, including the requirements of Section 114(a)(3) of the Clean Air Act or any applicable monitoring and analysis provisions of Section 504(b) of the Clean Air Act;
 - vi. Brief description of any deviations including identifying as possible exceptions to compliance any periods during which compliance is required and which the excursion or exceedances as defined in 40 CFR Part 64 occurred; and
 - vii. Any additional information as required by the Department, including information to determine compliance.

- b. The compliance certification shall be submitted **within sixty (60) days after** the end of each calendar year and shall be signed and dated by a responsible official.
- c. Upon the written request of the permittee, the deadline for submitting the compliance certification may be extended, if the Department determines that reasonable justification exists for the extension.

(Auth.: HAR §11-60.1-4, §11-60.1-86, §11-60.1-90)

- 4. By **August 29, 2019**, and **within sixty (60) days** following the end of each semi-annual calendar period (January 1 – June 30 and July 1 – December 31) thereafter, the permittee shall report semi-annually to the Department, the metric tons and short tons of CO₂e emitted, except that biogenic CO₂ shall be excluded from the total CO₂e emissions. The report shall be signed and dated by a responsible official. The following enclosed **form, or equivalent form**, shall be used for reporting and shall be signed and dated by a responsible official:

Monitoring Report Form: GHG Emissions

(Auth.: HAR §11-60.1-3, §11-60.1-5, §11-60.1-90)

Section F. Agency Notification

Any document (including reports) required to be submitted by this permit shall be done in accordance with Attachment I, Standard Condition No. 28.

(Auth.: HAR §11-60.1-4, §11-60.1-90)

¹The citations to the CFR identified under a particular condition indicate that the permit condition complies with the specified provision(s) of the CFR. Due to the integration of the preconstruction and operating permit requirements, permit conditions may incorporate more stringent requirements than those set forth in the CFR.

²The citations to the State Implementation Plan (SIP) identified under a particular condition indicate that the permit condition complies with the specified provision(s) of the SIP.

**ATTACHMENT III: ANNUAL FEE REQUIREMENTS
COVERED SOURCE PERMIT NO. 0087-02-C**

Amended Date:

Expiration Date: April 15, 2019

(Expiration date to be revised upon issuance of permit renewal)

The following requirements for the submittal of annual fees are established pursuant to Hawaii Administrative Rules (HAR), Title 11, Chapter 60.1, Air Pollution Control. Should HAR, Chapter 60.1, be revised such that the following requirements are in conflict with the provisions of HAR, Chapter 60.1, the permittee shall comply with the provisions of HAR, Chapter 60.1.

1. Annual fees shall be paid in full:
 - a. Within one hundred and twenty **(120) days** after the end of each calendar year; and
 - b. Within **thirty (30) days** after the permanent discontinuance of the covered source.
2. The annual fees shall be determined and submitted in accordance with Hawaii Administrative Rules, Chapter 11-60.1, Subchapter 6.
3. The annual emissions data for which the annual fees are based shall accompany the submittal of any annual fees and submitted on forms furnished by the Department.
4. The annual fees and the emission data shall be mailed to:

**State of Hawaii
Clean Air Branch
2827 Waimano Home Road, #130
Pearl City, HI 96782**

**MONITORING REPORT FORM
GHG EMISSIONS
COVERED SOURCE PERMIT NO. 0087-02-C
(PAGE 1 OF 3)**

Amended Date: _____

Expiration Date: April 15, 2019

(Expiration date to be revised upon issuance of permit renewal)

In accordance with the Hawaii Administrative Rules, Title 11, Chapter 60.1, Air Pollution Control, the permittee shall report to the Department of Health the following information semi-annually.

(Make Copies for Future Use)

For Period: _____ Date: _____

Facility Name: _____

Location: _____

I certify that I have knowledge of the facts herein set forth, that the same are true, accurate, and complete to the best of my knowledge and belief, and that all information not identified by me as confidential in nature shall be treated by the Department of Health as public record. In making this certification for the partnering facility conditions in Item 2 of this form, I am relying on information provided by other partners that these partners independently certify.

Responsible Official (Print): _____

Title: _____

Responsible Official (Signature): _____

1. Report the CO₂e emitted by the AES Hawaii, LLC, cogeneration plant during each reporting period for purposes of the facility's individual GHG emissions cap:

Emission Year Reporting For _____					
Reporting Period	AES Hawaii, LLC Emissions (Metric Tons of CO ₂ e)			AES Hawaii, LLC Emissions (Total CO ₂ e)	
	CO ₂ (Non-Biogenic)	CH ₄	N ₂ O	Metric Tons	Short Tons
January 1 – June 30 (1 st Semi-Annual Period)					
July 1 – December 31 (2 nd Semi-Annual Period)					
Total Emissions →					

Provide a copy of this completed form or equivalent to all other partnering facilities, signed and dated by the responsible official, to report the CO₂e emitted by the AES Hawaii, LLC, cogeneration plant during each reporting period for purposes of calculating total combined GHG emissions.

MONITORING REPORT FORM GHG EMISSIONS COVERED SOURCE PERMIT NO. 0087-02-C (CONTINUED, PAGE 2 OF 3)	
Amended Date:	Expiration Date: <u>April 15, 2019</u> <small>(Expiration date to be revised upon issuance of permit renewal)</small>

2. Report the total combined CO₂e emitted by all partnering facilities during each reporting period for purposes of the total combined GHG emissions cap for these facilities:

Emission Year Reporting For _____					
Reporting Period	Total Combined Emissions from All Partnering Facilities (Metric Tons of CO ₂ e)			Total CO ₂ e ^a	
	CO ₂ (Non-Biogenic)	CH ₄	N ₂ O	Metric Tons	Short Tons
January 1 – June 30 (1 st Semi-Annual Period)					
July 1 – December 31 (2 nd Semi-Annual Period)					
Total Emissions →					

^aThe total combined CO₂e emitted is based on completed monitoring report forms, signed and dated by each facility’s responsible official, to report the total combined CO₂e emitted by the partnering facilities.

3. For incidences when the individual cap for the AES Hawaii, LLC, cogeneration plant and total combined cap for all partnering facilities is exceeded, report the emissions in excess of the total combined cap using the following equation:

$$X = XG \frac{(A-C)}{\sum_{A_i > C_i} (A_i - C_i)} = \underline{\hspace{4cm}}$$

Where:

- X = Adjusted portion in metric tons or short tons of GHG emissions that are in excess of total combined cap specified in Attachment II – GHG, Special Condition No. C.1.b. The equation applies to all affected facilities that do not meet the individual and total combined GHG emission caps specified in Attachment II – GHG, Special Condition Nos. C.1.a and C.1.b, respectively.
- XG = Total combined actual GHG emissions from affected facilities minus total combined GHG emissions cap. The total combined emissions cap shall be sixteen percent (16%) below the total combined baseline emission level less biogenic CO₂ emissions.
- A = Actual GHG emissions from the affected facility.
- C = GHG emissions cap for the affected facility.
- $\sum_{A_i > C_i} (A_i - C_i)$ = The sum of the difference between the actual emissions and cap emissions for all facilities that did not achieve the individual facility-wide GHG emissions cap.

MONITORING REPORT FORM GHG EMISSIONS COVERED SOURCE PERMIT NO. 0087-02-C (CONTINUED, PAGE 3 OF 3)	
Amended Date:	Expiration Date: <u>April 15, 2019</u> <small>(Expiration date to be revised upon issuance of permit renewal)</small>

4. Report any changes to CEMS flow rate corrections initially applied to the CEMS setup for each boiler to correct bias high readings:

Emission Year Reporting For _____					
Correction Description	Initial Setup		CEMS Setup Changes		Reason for Change in CEMS Setup
	Boiler		Boiler		
	A	B	A	B	
CEMS K-Factor ^a	0.76	0.76			
WAF Factor	0.9147	0.9148			

^aAlso referred to as a flow data multiplier

5. Report on another sheet, any changes to CEMS dilution ratio algorithm initially applied to the CEMS setup of Boiler A to correct bias high readings.
6. Report on another sheet, any changes to CEMS dilution ratio corrections initially applied to the CEMS setup of Boiler B to correct bias high readings.
7. Submit the amount of limestone sorbent consumed for each calendar year after each second semi-annual reporting period:

Emission Year Reporting For _____		
Sorbent	Consumption (Short Tons/Year)	
	Boiler A	Boiler B
Limestone		

8. Provide a copy of the certificate of sampling and analysis, or equivalent, for all coal burned during the reporting year after each second semi-annual reporting period.