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February 8, 2021

CERTIFIED MAIL No. 7015 0640 0002 5911 5886
RETURN RECEIPT REQUESTED

Ms. Marianne Rossio
Manager
Clean Air Branch
2827 Waimano Home Road #130
Pearl City, Hawaii 96782

IES Downstream, LLC
CSP 0863-01-C and 0863-02-C
GHG Emission Reduction Plan Rev 2

Dear Ms. Rossio:

IES Downstream, LLC (IES) is hereby submitting its updated Greenhouse Gas Emission Reduction Plan (GHGERP) Rev 2 for its equipment located at 91-480 Malakole Street, Kapolei, Hawaii as further described below. This plan is being submitted to meet the requirements of §11-60.1-204(a) and revises the GHGERP that was submitted by Chevron on June 30, 2015.

IES transferred certain Kapolei Refinery operating units to Par Refining Hawaii, Inc. (Par) on December 19, 2018 at 11:59 pm; Par now operates the transferred refining units under CSP Nos. 0088-01-C, 0088-02-C and 0088-03-C. CSP 0088-01-C was amended to separate certain assets retained by IES and these assets' permitting obligations were addressed in a new permit for IES: CSP 0863-01-C. However, CSP 0863-01-C did not include process units that were being retained by IES (FCCU, part of Alky, and Dimersol) and further modification was recently completed to Par's CSP 0088-01-C to remove these IES retained process units that were omitted from the initial CSP 0863-01-C application. The permit CSP 0863-02-C for these process units was issued on December 18, 2020.

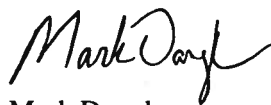
The transaction described above required a modification to the IES GHG Emission Reduction Plan. The original plan proposed 2009 as the baseline year and this update splits the baseline GHG emissions between both IES and Par in alignment with equipment ownership relative to CSP 0088-01-C, 0088-02-C, and 0088-03-C for Par and CSP 0863-01-C and 0863-02-C for IES. IES' new baseline will include the emissions for CSP 0863-01-C and CSP 0863-02-C. This update (Rev 2) to the Rev 1 GHG Emission Reduction Plan issued in August 2019 is intended to provide additional clarification to the baseline year calculations and also the equipment split between IES and Par West. It also reflects the most recent change in equipment ownership between IES and Par West related to Par's acquisition of Boilers 1,2, & 3 in January 2021, transferring the baseline emissions from Boilers 1,2,& 3 to Par West's GHG Baseline.

Manager
HDOH Clean Air Branch
February 8, 2021

Should you have any questions or require further information, please contact Gail Godenzi, Environmental and Process Engineer, at (808) 682-3113.

I certify as the company official having supervisory responsibility for the persons who prepared this document that this information is true, accurate, and complete to the best of my knowledge, information and belief.

Sincerely,

A handwritten signature in black ink that reads "Mark Dangler". The signature is written in a cursive style with a large, stylized "M" and "D".

Mark Dangler

gng

Attachments and CD w/Attachments

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Greenhouse Gas Emission Reduction Plan

**IES Downstream, LLC
91-480 Malakole Street
Kapolei, HI 96707**

**Covered Source Permit Nos. 0863-01-C
and
0863-02-C**

January 2021



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- A – October 28, 2016 Chevron Response in Request for Additional Information
- B – August 31, 2018 IES Response to DOH Email dated July 24, 2018
- C – CAB Letter dated July 22, 2019 – Request clarification to Baseline Yr Calculations
- D – IES Email sent on March 25, 2019 in response to 2/7/2019 Meeting

1.0 Introduction

A Greenhouse Gas (“GHG”) Emission Reduction Plan (“the GHG Plan” or “the Plan”) was submitted by Chevron on June 30, 2015 for the Hawaii Refinery to comply with requirements of the Hawaii Greenhouse Gas Emissions law¹ (the Act) and implement regulations of the Hawaii Department of Health (“DOH”).² On November 1, 2016, IES Downstream, LLC (“IES”) acquired the Hawaii Refinery and assumed responsibility of the GHG Plan. The GHG rule³ sets forth the regulatory program for meeting the statutory statewide GHG limit that is equal to or below the 1990 statewide GHG emission levels for each facility that emits more than 100,000 tons per year of GHG emissions. The GHG rule generally requires each regulated source to propose a GHG Plan that would cap the source’s direct GHG emissions to 16% of that source’s 2010 direct GHG emissions. In meeting the GHG limit, the regulation provides flexibility to the Director of the Department of Health, Clean Air Branch (“Director” or “CAB”) to set the facility-wide GHG emissions cap for an individual source by varying from the established regulatory structure in two ways: 1) by granting a request to use an alternate emission baseline; and 2) establishing an alternate GHG emission cap based on a finding that the presumptively required 16% reduction is not attainable.

The GHG rule is premised on an assumption that the GHG covered sources reducing their direct GHG levels by 16% from 2010 emission levels will be adequate to return the State of Hawaii to 1990 GHG levels. Although the ultimate goal of the Act is to reduce statewide GHG emissions to 1990 emission levels, the Kapolei Refinery has actually achieved reductions in GHG emissions to less than its estimated 1990 levels and, as a prudent operator, continues to seek these as part of our business. Unlike other sources of GHGs within the state and the selected industries subject to the current GHG rule that have seen growth, and thus increases in GHG emissions since 1990, the Kapolei Refinery has not experienced sustained increases in capacity and have decreased GHG emissions over this same period of time.

This updated GHG Plan is being submitted by IES to meet the requirements of §11-60.1-204(a). The IES Downstream, LLC – Kapolei Terminal and Kapolei Process Units, formerly known as the IES Kapolei Refinery (“Kapolei Refinery”), and further formerly known as the Chevron Hawaii Refinery, is located within the Campbell Industrial Park at 91-480 Malakole Street, Kapolei, Hawaii. The facility currently operates under two Covered Source Permits (CSP) Nos. 0863-01-C (Terminal), and 0863-02-C (Process Units) issued by the Hawaii Department of Health.

The Kapolei Refinery began operation in 1960 with capacity of processing up to 58,000 barrels of crude oil per day. The Kapolei Refinery did not operate at this rated capacity in recent history but rather set its operations based on market demands. The facility consisted of numerous

¹ HRS §§ 342B *et seq.*, enacted by Act 234, 2007 Hawaii Session Laws.

² HAR § 11-60.1-204, “Greenhouse gas emission reduction plan.” Hereinafter, the “GHG rule.”

³ HAR §11-60.1-201, Purpose.



operational units, including crude vacuum and distillation units, fluid catalytic cracker, dimersol, hydrogen manufacturing, alkylation, and isomerization units. The Kapolei Refinery operated utilities including boilers, cogeneration units, effluent treatment plant, and tank fields for storage, blending, and shipping capability in support of its operations.

IES transferred certain Kapolei Refinery operating units to Par Refining Hawaii, Inc. (Par) on December 19, 2018 at 11:59 pm; Par ("Par West") now operates the transferred refining units under CSP Nos. 0088-01-C, 0088-02-C and 0088-03-C. CSP 0088-01-C was initially amended to separate certain assets retained by IES and these assets' permitting obligations were addressed in a new permit for IES: CSP 0863-01-C. However, CSP 0863-01-C did not include refining units that were being retained by IES (FCCU, part of Alky, and Dimersol) and further modification was recently completed to amend CSP 0088-01-C to remove these IES retained process units that were omitted from the initial CSP 0863-01-C application. The permit CSP 0863-02-C for these process units was issued on December 18, 2020.

The transaction described above requires a modification to the IES GHG Emission Reduction Plan. The original plan proposed 2009 as the baseline year and this update splits the baseline GHG emissions between both IES and Par West in alignment with equipment/permit ownership, CSP 0088-01-C, 0088-02-C, and 0088-03-C for Par and CSP 0863-01-C and 0863-02-C for IES. IES' new baseline will include the emissions for CSP 0863-01-C and CSP 0863-02-C. This update (Rev 2) to the Rev 1 GHG Emission Reduction Plan issued in August 2019 is intended to provide additional clarification to the baseline year calculations and also the equipment split between IES and Par West. It also reflects the most recent change in equipment ownership between IES and Par West related to Par's acquisition of Boilers 1, 2, & 3 in January 2021, transferring the baseline emissions from Boilers 1, 2, & 3 to Par West's GHG Baseline.

This plan consists of 6 sections. Section 2 presents the proposed baseline emissions year for the Kapolei Refinery and splits the baseline emissions between Par owned facility (hereinafter referred to as the "Par West") and the IES Terminal and IES Process Units (hereinafter referred to as the "IES Facility"). Section 3, discusses the proposed IES Facility 2020 facility-wide direct GHG Emissions cap. Section 4 discusses the IES Facility GHG Control Assessment, Section 5 discusses the IES Facility Proposed Control Strategy, and Section 6 discusses Partnering the IES Terminal and IES Process Units. Appendices of this plan contain past submittals to DOH CAB with detailed calculations and analysis supporting the baseline selection.

2.0 Request for Alternate Baseline Annual Emission Year

Section 11-60.1-204(d)(1) generally requires regulated sources to use 2010 to compute the GHG baseline emissions. This paragraph, however, also allows an owner or operator to propose an alternate GHG emission baseline and includes several potential methodologies to support computation of an acceptable alternative. These alternatives allow an owner or operator to use emissions from the years 2006-2010 in various formulations, if the owner or operator documents that 2010 is “not representative of normal source operations.”

2.1 PROPOSED ALTERNATE BASELINE YEAR

Per §11-60.1-204(d)(1)(A)(i), the GHG Plan submitted on June 30, 2015, requested that the Director approve an alternative baseline year of 2009 based on the criteria that it is the most representative year during the five-year period between 2006 and 2010 calendar years. Direct GHG emission estimates for the proposed 2009 baseline year are 577,945 metric tons (tonnes) per year of carbon dioxide equivalent (CO₂e). Table 1. GHG Annual Emission Summary indicates the direct GHG emissions estimated for the 1990 calendar year as well as the calculated 2009 and 2010 calendar years. The 1990, 2009, and 2010 calendar years were calculated using the methodologies as required by the GHG Reporting Rule in 40 CFR Part 98; however, estimates were used for some operational data that was unavailable for the 1990 calendar year.

Table 1. GHG Annual Emission Summary

Calendar Year	Direct emissions reported per year of CO₂e
1990 (est)	613,900 MT (676,709 T)
2009 (Baseline year)	577,945 MT (637,075 T)
2010	529,651 MT (583,840 T)

To provide context for the Refinery's request to use alternative baseline year, the table above also shows that the refinery had already taken significant measures to reduce energy consumption and CO₂e emissions well below the levels that had been established back in 1990, which was the stated purposed of both the Act and the GHG regulation.

2.2 JUSTIFICATION

Follow up documentation to support the selection of 2009 as the baseline year was requested by DOH CAB on February 10, 2016 resulting in two response letters submitted by Chevron on October 28, 2016, one with Confidential Business Information (CBI) and the other with non-CBI information. The CBI letter explained the criteria used for determining normal source operations in which process unit shutdown periods and utilization-related data were analyzed to determine the most representative year during the five-year period ending in 2010. They presented three alternatives for consideration to be used as the baseline with 2009 emissions as the most recent representative year. The non-confidential content of the CBI response is summarized in section 2.2.1 through 2.2.4. The non-CBI letter provided additional data and information about GHG emission calculations for the 2006-2010 calendar years and is summarized in section 2.3 and Appendix A.

2.2.1 Unit Downtime

Kapolei Refinery GHG emissions occur from the processing of crude oil to produce high value products that are distributed in commerce for fuels. GHG emissions from normal operations are generated from the following sources:

1. Combustion of fuels supplying heat to the Kapolei Refinery processes (account for approximately 60% of total GHG emissions from the Kapolei Refinery)
2. Coke combustion in the Fluid Catalytic Cracking (FCC) Unit (account for approximately 35% of total GHG emissions from the Kapolei Refinery)
3. Hydrogen Plant
4. Crude Storage
5. Fugitives (piping)
6. (Emissions from) Flaring Events
7. Acid Gas Production (<5% of total GHG emissions from the Kapolei Refinery).

Normal source operations are characterized by crude and process unit throughputs (utilization) and continuous operation that allow the Kapolei Refinery to meet the fuel market demands.

Factors that can impact normal operations include:

1. Unit downtime, whether planned or unplanned, including crude supply interruptions and turnaround years;
2. External factors that reduce utilization, including widespread economic downturns impacting fuel market demands;
3. Periods of malfunction resulting in excess emissions, including force majeure events.

At the Kapolei Refinery, planned maintenance is required for each unit. Short-term shutdowns to service equipment in each process unit occur regularly during the year and typically only last hours. Approximately every five years the units have scheduled long-term shutdowns that can last weeks or months, which all occur in a "turnaround (TA) year". A TA year differs on average

12% of CO₂e GHG emissions from the year before it and can vary up to 19%. TA years are not considered representative of normal operation due to this impact.

2.2.2 Refinery Utilization

A second quantitative marker of “normal source operations” is refinery utilization. Utilization can be described in several ways including crude throughput, process unit feed rates, product output, and Complexity Weighted Barrels (CWB) throughput.

Throughput is typically measured in barrels or barrels per day. For benchmarking comparison of multiple facilities in the refining industry, California Air Resources Board has standardized on Complexity Weighted Barrels, CWB, as a refinery’s throughput measurement in their Regulation for the Mandatory Reporting of Greenhouse Emissions.⁴

In determining the CWB throughput, the actual crude and individual process unit throughputs, in barrels, are weighted by factors that equalize the number and complexity differences in process units found at different facilities. For the same crude throughput, a refinery with more processing will have a higher CWB.

CWB is correlated with GHG emissions, because more processing generally leads to higher GHG emissions. Thus, CWB is a throughput measurement normalized for the complexity of the Kapolei Refinery that is a reasonable metric for discussing GHG emissions.

2.2.3 Procedures for Determining Alternative Baseline Year

2.2.3.1 HAR §11-60.1-204 (d)(1)(A)(i)

HAR §11-60.1-204 (d)(1)(A)(i) allows a facility to determine alternative facility-wide GHG emissions (less biogenic CO₂) based on the most recent representative year during the five-year period ending 2010. The Kapolei Refinery considers representative operation to be periods with (1) no significant process unit shutdowns and (2) a CWB throughput that reflects normal fuel markets and falls within the normal operating window.

No significant process unit shutdowns are a measure of normal operation because during extended periods of shutdown or shutdowns of the large process units such as the Crude Unit or the Fluid Catalytic Cracker, the emissions are low to zero, and do not represent emissions when the units are operating. Refinery CWB throughput is determined by the fuel markets that the Kapolei Refinery supplies and relates to Actual GHG emissions because firing rates of Kapolei Refinery heaters and boilers are determined by the feed to the process units.

2009

The 2009 calendar year meets the criteria of normal operation, as no significant shutdowns occurred and Kapolei Refinery CWB throughput was within the normal range.

⁴ Title 17, California Code of Regulations, Section 95100 et seq, (MRR)



2008

2008 was a turnaround year, in which the Kapolei Refinery executed a planned refinery-wide shutdown that lasted 31 days (8% of the year) at the Crude Unit and 41 days (11% of the year) for the FCCU. The CWB throughput for the year was significantly impacted by this downtime. The combined influence of these two criteria makes the 2008 calendar year non-representative of normal operation.

2007

The 2007 calendar year meets the criteria of normal operation, as no significant shutdowns occurred and Kapolei Refinery CWB throughput was within the normal range.

2006

In calendar year 2006, two external events occurred that resulted in significant unit downtime and had impact on the Kapolei Refinery CWB throughput. On February 21, 2006, a refinery-wide shutdown unexpectedly occurred as a result of an island-wide power outage. The FCC downtime was extended in order to internally inspect equipment. On October 15, 2006, a second refinery-wide shutdown occurred as a result of an island-wide power outage following an earthquake off the island of Hawaii. These two events resulted in 30 days of FCC downtime, or 8% of the year. It also resulted in a 1% overall downtime for the Crude Unit. This significant downtime also lowered the Kapolei Refinery CWB. The combined influence of these two events makes the 2006 calendar year non-representative of normal operation.

Table 2. below summarizes the evaluation of the 2006-2010 calendar years.

Table 2. Normal Operation Analyses Summary

Year	Direct Actual GHG Emissions	Kapolei Refinery Operation Impacted by Shutdowns	Kapolei Refinery Throughput	Representative Year?
2010	529,651 MT (583,840 T)	Kapolei Refinery Actual GHG emissions reduced due to an unplanned FCC shutdown	Kapolei Refinery Actual GHG emissions reduced due to lower refinery throughput	No
2009	577,945 MT (637,075 T)	No impact	No impact	Yes
2008	522,593 MT (576,060 T)	Planned Kapolei Refinery turnaround (TA)	Not estimated due to impact from TA	No
2007	569,048 MT (627,268 T)	No impact	No impact	Yes
2006	536,124 MT (590,976 T)	Kapolei Refinery Actual GHG	No impact	No



		emissions reduced due to an unplanned refinery-wide shutdown		
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2.2.3.2 HAR §11-60.1-204 (d)(1)(A)(ii)

The next method allowed by HAR §11-60.1-204 (d)(1)(A)(ii) is to average facility-wide Actual GHG emissions (less biogenic CO₂) over any consecutive two-year period during the five-year period ending in 2010. As described in the previous section, there are no representative consecutive two-year periods; therefore, this method is not feasible.

However, averaging the two years with Actual GHG emissions representative of normal operation, 2009 and 2007, does reflect emissions that could be considered representative. The average Actual GHG emissions for 2007 and 2009 are 573,496 tonnes CO₂e.

2.2.3.3 HAR §11-60.1-204 (d)(1)(A)(iii)

The third method allowed by HAR §11-60.1-204 (d)(1)(A)(iii) is to average facility-wide GHG emissions (less biogenic CO₂) for the five-year period ending in 2010. As described in the previous section, the five-year period ending in 2010 includes three years that are not representative of normal operation for GHG emissions; therefore, this method is not feasible.

2.2.3.4 HAR §11-60.1-204 (d)(1)(A)(iv)

The fourth method allowed by HAR §11-60.1-204 (d)(1)(A)(iv) is to utilize comparable methods as approved by the director. As noted in the regulation, the director will not consider the use of periods greater than five years from 2010, except for extreme cases such as where an affected source may not have been fully operational for an extended period of time.

A comparable method for determining an alternative baseline year, is to adjust the actual emissions of a non-representative year to reflect expected emissions from restored operation. Chevron adjusted the 2010 calendar year emissions to include the GHG emissions for the FCC shutdown days and unrealized refinery throughput (adjusted to mean CWB value). Data showed that 2010 GHG CO₂e emissions would have been at most 2.5% greater than years 2007 and 2009 emissions and 2010 CWB varied from 2% and 4% of years 2007 and 2009 throughput which had throughput within normal the range.

2.2.4 Baseline Year Determination Conclusion

Following HAR §11-60.1-204 (d)(1)(A)(i-iv), the procedures set forth to evaluate alternative baseline year emissions, the Kapolei Refinery has determined the following:

1. Calendar year 2009 Actual GHG emissions are the most recent representative of normal operations. These emissions are 577,945 tonnes CO₂e per year.
2. The average of Actual GHG emissions for calendar years 2009 and 2007 is the second most representative baseline emissions. These emissions are 573,497 tonnes CO₂e per year.
3. The adjusted 2010 calendar year Actual GHG emissions estimated to remove the impacts of downtime and lost CWB throughput could be considered feasible and is the third most representative baseline emissions. These emissions are ~0.3% greater than 2009 emissions.

2.2.5 Additional documentation requested

In meetings with DOH, Chevron shared that calculations of GHG emissions had been performed in 3 different tools from 2006-2015. SANGEA (2006-2009); CGERS (2010-2014); ESS (2015). In the non-CBI letter submitted on October 28, 2106, Chevron reviewed the different calculation methodologies used for Kapolei Refinery GHG emissions from 2006 to 2010. They also used the input data from those years and recalculated emissions using current GHG calculation methods in a demonstration workbook. Emissions differed from between 1% to 7-10% due to differences in averaging and summing data, changes in GWP conversion factors for CO₂e, changes in emission factors for fuel combustion, and a difference in FCC Unit coke combustion methodology in 2006-2007. Appendix A contains a copy of the non-CBI letter with details on the methodology and calculations in the demonstration workbook.

A follow up email from DOH was sent to IES on April 4, 2018, in response to the non-CBI letter from Chevron. The email identified items of interest related to the calculation of the proposed GHG Plan baseline and SLEIS reporting, where DOH used SLEIS data to validate the GHG emissions calculations provided by Chevron for calendar years 2006 to 2010. Of interest to HDOH were calculation differences between the FCC CO₂ emission calculations and differences between fuel throughputs, higher heating values (HHV) and annual heats associated with fuel oil, fuel gas, and whole straight run combustion for the proposed 2009 baseline year. IES concluded that these differences were attributed to differences in averaging and summing data, data gathering methods, and the use of the default Natural Gas HHV for fuel gas calculations. IES provided a written emailed response along with a copy their 2016 and 2017 GHG calculation worksheets and fuel oil, fuel gas, and whole straight run analysis worksheets in an email to DOH on August 31, 2018. The emailed response sent to DOH is included in Appendix B.

After careful review of all the data, the January 2021 Rev 2 GHG Emission Reduction Plan proposes to use the most conservative approach to the numbers for the baseline year request.



2.2.6 Conclusion

Based on detailed reviews of historical operation, 2006-2010 GHG input data, and computational comparisons with SLEIS data done in cooperation with DOH CAB, 2009 is the most recent representative year for the Kapolei Refinery facility-wide baseline annual emission rate during the five-year period ending 2010 with emissions of 577,945 tonnes of CO₂e per year.

2.3 BASELINE EMISSION SPLIT

IES proposes to split the Kapolei Refinery 2009 baseline emissions, which contain equipment transferred to Par in CSP 0088-01-C, in alignment with IES Terminal (CSP 0863-01-C) and IES Terminal (CSP 0863-01-C). The breakdown of emissions is listed in Table 3.

Table 3. Baseline Emission Split

Permit Number Baseline Year		Jan-21		Jan-21	
		Par West Refinery	IES Terminal + Process Units	IES Terminal	IES Process Units
		0088-01-C	0863-01-C and 0863-02-C	0863-01-C	0863-02-C
		2009	2009	2009	2009
Subpart C	Fuel Oil Combustion	193,346			
	Fuel Gas Combustion	100,767	3,223		3,223
	WSR Combustion	44,986			
	Total Subpart C	339,099	3,223		3,223
Subpart P	Hydrogen Mfg	7,247	-		-
Subpart Y	FCC Coke Combustion	-	226,349		226,349
	Flare P1	1,017	-		-
	Flare P2 (Crude/Sweet)	117	-		-
	Acid Plant	485	-		-
	Fugitive Venting (Columns)	308	55		55
	Loading Vent (Crude Receipts)	-	45	45	
	Total Subpart Y	1,927	226,449	45	226,404
Totals		348,273	229,672	45	229,627
		577,945		229,672	



The permitted equipment in the 2009 Baseline Emission between Par West Refinery and IES Terminal & IES Process Units as shown in Table 4.

Table 4. Split of Permitted Equipment in 2009 Proposed Baseline Year Emissions

2009
CSP 0088-01-C (unless noted)

Subpart C	Refinery	Terminal
	Fuel Oil Combustion	Fuel Oil Combustion
	F-5103 - Crude Atm Furnace	
	F-5153 - Crude Vac Furnace	
	F-5201 - Boiler	
	F-5202 - Boiler	
	F-5203 - Boiler	
	Fuel Gas Combustion	Fuel Gas Combustion
	F-5103 - Crude Atm Furnace	F-5300 - FCC Furnace
	F-5153 - Crude Vac Furnace	F-5310 - FCC Startup Air Heater
	F-5700 - Hydrogen Furnace	
	F-5930 - Isomerization Furnace	
	F-5950 - Isomerization Furnace	
	F-5600 - Hydrogenation Furnace	
	F-6200 - Acid Plant Combustion Chamber	
	F-6260 - Acid Plant Pre-heater	
	F-6701 - Cogen	
	F-6702 - Cogen	
	F-6703 - Cogen	
	F-6704 - Cogen (CSP 0088-02-C)	
	F-5201 - Boiler	
	F-5202 - Boiler	
	F-5203 - Boiler	
	WSR Combustion	WSR Combustion



	TG-6701 - Cogen	
	TG-6702 - Cogen	
	TG-6703 - Cogen	
	TG-6704 - Cogen (CSP 0088-02-C)	
Subpart P		
	Hydrogen Mfg Plant	
Subpart Y		
		FCC Coke Combustion
	Flare P1	
	Flare P2 (Crude/Sweet)	
	Acid Plant	
	Fugitive Venting (Columns)	Fugitive Venting (Columns)
	C-5100 - Crude Unit	C-6660 - Dimersol Unit
	C-5150 - Crude Unit	C-5850 - Alkylation Unit
	C-5170 - Crude Unit	C-5860 - Alkylation Unit
	C-5830 - Alkylation Unit	C-5330 - FCC Unit
	C-5840 - Alkylation Unit	C-5340 - FCC Unit
	C-5940 - Isomerization Unit	C-5350 - FCC Unit
	C-6101 - Amine/Acid Unit	C-5405 - FCC Unit
		C-5400 - FCC Unit
		C-5410 - FCC Unit
		C-5420 - FCC Unit
		C-5450 - FCC Unit
		Loading Vent (Crude Receipts)



The post-transfer split of currently permitted equipment in Par Refinery CSP Nos. 0088-01-C, and IES Terminal CSP No. 0863-01-C and CSP No. 0863-02-C are shown in Table 5.

Table 5. Post-transfer Split of Permitted Equipment as of January 2021

2021			
CSP 0088-01-C (unless noted)		CSP 0863-01-C	CSP 0863-02-C
Par West Refinery		IES Terminal	IES Process Units
Subpart C	Fuel Oil Combustion	Fuel Oil Combustion	Fuel Oil Combustion
	F-5103 - Crude Atm Furnace		
	F-5153 - Crude Vac Furnace		
	F-5201 - Boiler		
	F-5202 - Boiler		
	F-5203 - Boiler		
	Fuel Gas Combustion	Fuel Gas Combustion	Fuel Gas Combustion
	F-5103 - Crude Atm Furnace		F-5300 - FCC Furnace
	F-5153 - Crude Vac Furnace		F-5310 - FCC Startup Air Heater
	F-5700 - Hydrogen Furnace		
	F-5930 - Isomerization Furnace		
	F-5950 - Isomerization Furnace		
	F-5600 - Hydrogenation Furnace		
	F-6200 - Acid Plant CC		
	F-6260 - Acid Plant Pre-heater		
	F-6701 - Cogen		
	F-6702 - Cogen		
	F-6703 - Cogen		
	F-6704 - Cogen (CSP 0088-02-C)		
	F-5201 - Boiler		
	F-5202 - Boiler		
	F-5203 - Boiler		
	WSR Combustion	WSR Combustion	WSR Combustion
	TG-6701 - Cogen		
	TG-6702 - Cogen		
	TG-6703 - Cogen		

GHG EMISSION REDUCTION PLAN REV 2
IES DOWNSTREAM, LLC
JANUARY 2021



	TG-6704 - Cogen (CSP 0088-02-C)		
	Diesel		
	F-5205 – Boiler (CSP 0088-02-C)		
	F-5206 – Boiler (CSP 0088-02-C)		
	Black Start Generator (CSP 0088-03-C)		
	RICE-110 (CSP 0088-03-C)		
	Rice-1233 (CSP 0088-03-C)		
	RICE-1522 (CSP 0088-03-C)		
	CatOx		
	Catalytic Oxidizer		
Subpart P	Hydrogen Mfg Plant		
Subpart Y			FCC Coke Combustion
	Flare P1		
	Flare P2 (Crude/Sweet)		
	Acid Plant		
	Fugitive Venting (Columns)		Fugitive Venting (Columns)
	C-5100 - Crude Unit		C-6660 - Dimersol Unit
	C-5150 - Crude Unit		C-5850 - Alkylation Unit
	C-5170 - Crude Unit		C-5860 - Alkylation Unit
	C-5830 - Alkylation Unit		C-5330 - FCC Unit
	C-5840 - Alkylation Unit		C-5340 - FCC Unit
	C-5940 - Isomerization Unit		C-5350 - FCC Unit
	C-6101 - Amine/Acid Unit		C-5405 - FCC Unit
			C-5400 - FCC Unit
			C-5410 - FCC Unit
			C-5420 - FCC Unit
			C-5450 - FCC Unit
		Loading Vent (Crude Receipts)	

3.0 2020 Direct GHG Emissions Cap – IES Downstream, LLC

Per §11-60.1-204(d)(2), the regulation requires a 16% reduction from the proposed IES Terminal and Process units 2009 baseline year emission split of 229,672 tonnes per year CO₂e. This equates to a reduction of 36,748 total tonnes per year of CO₂e and a combined emissions cap of 192,924 tonnes per year CO₂e.

IES proposes a cap of **192,924 tonnes (212,660 T)** per year CO₂e for its combined operations under CSP 0863-01-C and 0863-02-C operating permits to meet the State's 16% emission reduction requirement. IES is requesting to partner the two facilities into one combine facility-wide GHG emission caps. See section 6.0.

4.0 GHG Control Assessment

Per §11-60.1-204(d)(2), the GHG rule requires each affected source to conduct a GHG control assessment. IES has reviewed the available control measures identified in §11-60.1-204(d)(3), and developed a control strategy based on the available control measures but, have not included it in the updated GHG plan because IES can attain a 16% reduction in emissions.

5.0 Proposed Control Strategy

Per §11-60.1-204(d), the regulation requires each affected source to propose a control strategy to include a listing of identified control measures that can be implemented in order to meet the required or proposed alternate 2020 facility-wide GHG emissions cap. IES has conducted a GHG control assessment of these control measures. IES control strategy is as follows:

§11-60.1-204(d)(3)

(E) Restrictive Operation: Process Unit Turndown: Reduce output from certain process units

The above Control strategy of Unit Turndown of the Process units (CSP 0863-02-C) will allow for a 16% reduction from the proposed combined facility 2009 baseline year and has been deemed technically feasible. This equates to a reduction of **36,748** tonnes per year CO₂e and an emissions cap of **192,924** tonnes per year CO₂e.



6.0 Partnering of CSP 0863-01-C and CSP 0863-02-C

Pursuant to the provisions of the GHG Rule §11-60.1-204(d)(6)(A), the regulation allows facilities to propose to combine their facility-wide GHG emission caps to leverage emission reductions among partnering facilities in meeting the combined GHG emission caps. IES plans to partner the IES Terminal facilities and IES Process Units to achieve the State's GHG emission reduction target. The combined emissions cap will be made part of the permit for each partnering facility in accordance with HAR §11-60.1-204(d)(6)(C).

Table 6. Reflects the individual facility and combined partnering baseline and annual GHG emissions limits.

Table 6. Individual and Combined CO₂e Baseline and Caps

		IES Terminal 0863-01-C	IES Process Units 0863-02-C
		2009	2009
Subpart C	Fuel Oil Combustion		
	Fuel Gas Combustion		3,223
	WSR Combustion		
	Total Subpart C		3,223
Subpart P	Hydrogen Mfg		-
Subpart Y	FCC Coke Combustion		226,349
	Flare P1		-
	Flare P2 (Crude/Sweet)		-
	Acid Plant		-
	Fugitive Venting (Columns)		55
	Loading Vent (Crude Receipts)	45	
	Total Subpart Y	45	226,404

Individual Baselines, CO₂e
Tonnes

45	229,627
----	---------

Total Baseline, Tonnes

229,672

Proposed Cap - 84%, Tonnes

38	192,887	192,924
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CO₂e Reduction, Metric Tonnes

7	36,741	36,748
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Appendix A

October 28, 2016 Chevron Response in Request for Additional Information



Jon Mauer
Refinery Manager

Chevron Products Company
Hawaii Refinery
91-480 Malakole Street
Kapolei HI 96707-1807
Tel 808-682-5711
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JonMauer@chevron.com

October 28, 2016

CERTIFIED MAIL No. 7016 0750 0001 1527 8811
RETURN RECEIPT REQUESTED

Ms. Catherine Lopez
Acting Manager, Clean Air Branch
Environmental Management Division
919 Ala Moana Boulevard
Honolulu, Hawaii 96814

Chevron Hawaii Refinery
Response to Item 2(d) in Request for Additional Information
GHG Emission Reduction Plan

Dear Ms. Lopez:

The Chevron Products Company is hereby submitting additional information as requested by the Clean Air Branch (CAB) staff for evaluation of the Refinery's Greenhouse Gas Emission Reduction Plan (GHGERP), submitted June 30, 2015. This submittal provides the information requested in item 2(d) from the CAB letter dated February 10, 2016. This information is submitted to meet the requirements of §11-60.1-204(a).

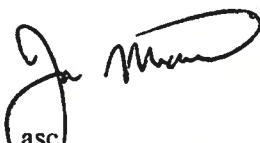
The following attachments are provided in this submittal:

Attachment I	Refinery GHGERP submitted June 30, 2015
Attachment II	CAB letter Requesting Additional Information, dated February 10, 2016
Attachment III	Refinery Preliminary Recommendation Plan, dated June 30, 2016
Attachment IV	Compact Disc (CD) containing GHG Calculations 2006-2010.xlsx
Attachment V	Printout of Excel File on CD

If you should have questions or require further information, please contact Anna Chung at (808) 682-3366.

I certify, as the company official having supervisory responsibility for the persons who acting under my direct instructions made the verification, that this knowledge is true, and accurate, and complete to the best of their knowledge, information, and belief.

Sincerely,


asc
Attachments

**Chevron Hawaii Refinery
GHGERP Additional Information, Item 2(d) in CAB February 10, 2016 Letter
GHG Emissions for Calendar Years 2006-2010
October 31, 2016**

1.0 Introduction

The Chevron Hawaii Refinery (referred to here as the Refinery) submitted the GHG Emission Reduction Plan, as required by HAR §11-60.1-204(a), on June 30, 2015 (Attachment I). The Department of Health (DOH) Clean Air Branch (CAB) requested additional information in the February 10, 2016 letter (Attachment II), and over the next several months, the Refinery provided information and communicated with CAB staff to clarify the information requested. The Refinery provided a preliminary recommendation to provide the remaining information in a letter dated June 30, 2016 (Attachment III).

The additional information on GHG emission calculations for the 2006-2010 calendar years, requested in item 2(d) in CAB's February letter, is provided in this submittal. The summary of the calculation methodologies is included below. A compact disk (CD) is included as Attachment IV which contains the detailed calculations. Attachment V contains a printout of the detailed calculations.

2.0 GHG Emissions

2.1 Calculation Methodology

Refinery GHG emissions occur from the processing of crude oil to produce high value products that are distributed in commerce for fuels. Greenhouse gases generated at the refinery include carbon dioxide (CO₂), nitrous oxide (N₂O), and methane (CH₄). These emissions are reported as both mass emission rates and the CO₂ equivalent (CO₂e) emission rates. CO₂e emissions are computed by multiplying the mass amount of emissions (tpy) for each of the greenhouse gases by each of the gases' associated global warming potential values published at 40 CFR Part 98, Subpart A, Table A-1, and summing the resultant values of each gas to compute a tpy CO₂ equivalent (CO₂e).

Three greenhouse gases included in the HAR §11-60.1-1 definition are not generated (hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride), and therefore are not included in the further GHG discussion and calculations. In addition, there are no biogenic CO₂ emissions at the refinery, or indirect GHG emissions (GHG emissions generated by a different facility), in accordance with HAR §11-60.1-202 definition of the facility-wide GHG emissions cap.

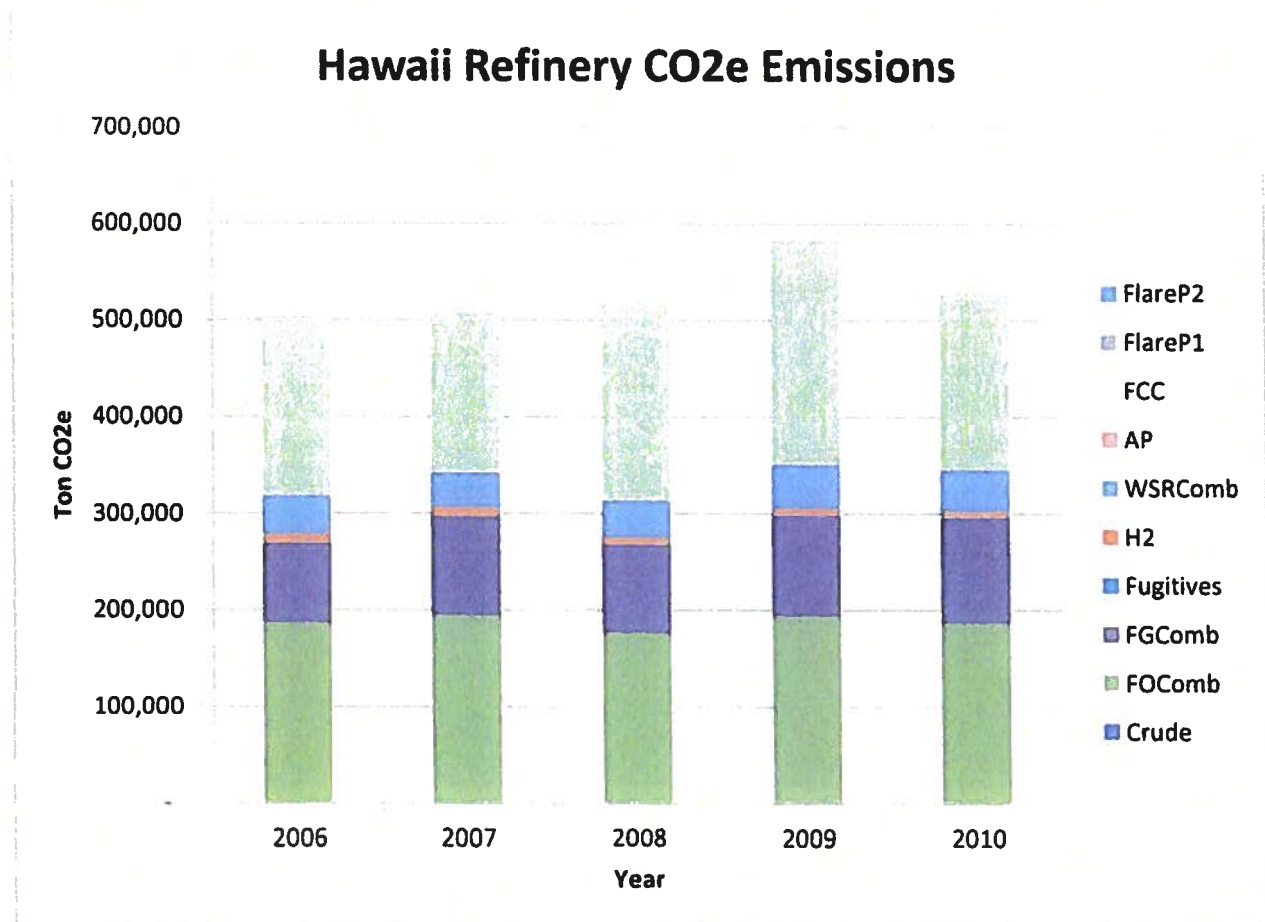
Refinery GHG emissions can be categorized by the type of emissions source:

1. Combustion of liquid and gaseous fuels in stationary sources including process heaters, boilers, cogeneration units
2. Coke combustion in the Fluid Catalytic Cracking Unit
3. Remaining sources, including:
 - a. Hydrogen Manufacturing
 - b. Crude Storage
 - c. Fugitives
 - d. Flaring
 - e. Acid Gas Processing

**Chevron Hawaii Refinery
 GHGERP Additional Information, Item 2(d) in CAB February 10, 2016 Letter
 GHG Emissions for Calendar Years 2006-2010
 October 31, 2016**

As shown in Figure 1, the Refinery's GHG Emissions are primarily a result of fuels combustion and the FCC Unit coke combustion. Fuels combustion includes combustion of Fuel Oil (FO), Fuel Gas (FG), and Whole Straight Run (WSR).

Figure 1. GHG Emissions Breakdown



Combustion Emissions from Fuel Oil, Fuel Gas and Whole Straight Run Fuels: FOComb, FGComb, and WSRComb
 Coke Combustion Emissions from Fluid Catalytic Cracking (FCC) Unit: FCC
 Hydrogen Manufacturing Vent Emissions: H2
 Crude Storage Emissions: Crude
 Fugitive Emissions from Process Piping: Fugitives
 Flaring Emissions: Flare P2 and Flare P1
 Acid Gas Processing Emissions: AP

Chevron Hawaii Refinery
GHGERP Additional Information, Item 2(d) in CAB February 10, 2016 Letter
GHG Emissions for Calendar Years 2006-2010
October 31, 2016

The GHG emission calculation methodologies in the attached Excel workbook (Attachment IV) follow the methods prescribed in the following 40 CFR 98 sections:

- Subpart A – General Provisions
- Subpart C – General Stationary Fuel Combustion Sources
- Subpart P – Hydrogen Production
- Subpart Y – Petroleum Refineries

These calculation methodologies are the basis for current regulatory compliance for estimating and reporting GHG emissions, and are summarized in Table 1 below.

The GHG emissions results from the workbook for the years 2008 through 2010 are a demonstration of current GHG calculation methods. The demonstration workbook introduces minor differences (approximately 1%) from the actual GHG emissions due to differences in averaging and summing data, changes in GWP conversion factors for CO₂e, and changes in emission factors for fuel combustion. The demonstration workbook utilizes current (2015) emission factors and GWP factors, and sums and averages on a monthly basis.

For the reporting years 2006-2007, the demonstration workbook GHG emissions are 7-10% different from the actual emissions calculated at the time utilizing standardized emissions methodologies¹. These differences are due to the same issues described above, and also due to a different methodology for FCC Unit coke combustion emissions. For 2006 and 2007, the emissions for the FCC Unit are calculated by a different methodology from later years due to the lack of reliable CO₂ analyzer data for those periods. This methodology calculates GHG emissions from emission factors and average coke burn rate.

¹ American Petroleum Institute, Compendium of Greenhouse Gas Emissions Methodologies for the Oil and Natural Gas Industry, Releases 2001, 2004, 2009.

Chevron Hawaii Refinery
GHGERP Additional Information, Item 2(d) in CAB February 10, 2016 Letter
GHG Emissions for Calendar Years 2006-2010
October 31, 2016

Table 1. Refinery GHG Emission Calculation Methodologies

GHG Emissions Source	CO₂	CH₄	N₂O	Methodology	Equations	Input Data
Liquid Fuel Combustion (FO Comb and WSR Comb) ²	X	X	X	Subpart C Tier 2	Equations: C-2a C-2b C-9a	Fuel Volume HHV
Gaseous Fuel Combustion (FGComb) ²	X	X	X	Subpart C Tier 3	Equations: C-5 C-8	Carbon Content Molecular Wt Fuel Flow Rate
FCC Coke Combustion (FCC) ²	X	X	X	Subpart Y Tier 4	Equations: Y-6 Y-7a Y-7b Y-9 Y-10	Analyzer data Inlet Air Carbon Fraction in Coke Burned
Hydrogen Production (H2) ²	X			Subpart P	Equations: P-1	Carbon Content Molecular Wt Fuel Flow Rate
Flaring (Flare P1 and Flare P2) ²	X	X	X	Subpart Y	Equations: Y-3 Y-4 Y-5	Molecular Fraction of Carbon HHV Manual Samples
Acid Gas Processing (AP) ²	X			Subpart Y	Equations: Y-12	Volumetric Flow rate
Fugitives (Fugitives) ²		X		Subpart Y	Equations: Y-21	Equipment type Number of units
Crude Storage (Crude) ²		X		Subpart Y	Equations: Y-22	Crude Received

² () refer to naming conventions in Figure 1.

Chevron Hawaii Refinery
GHGERP Additional Information, Item 2(d) in CAB February 10, 2016 Letter
GHG Emissions for Calendar Years 2006-2010
October 31, 2016

2.2 Results

GHG emissions for the 2006-2010 calendar years are shown in Table 2, below, for the 2006-2010 calendar years.

Table 2. Refinery GHG Emissions³

Year	Demonstration Workbook Calculated Emissions			Actual Emissions	
	Fuel Combustion (tonnes/yr)	FCC Emissions (tonnes/yr)	All Other Emissions (tonnes/yr)	Total Emissions (tonnes/yr)	Total Emissions (tonnes/yr)
2006	308,406	162,976	11,148	482,530	536,124
2007	331,667	184,301	11,486	527,454	569,048
2008	305,447	203,649	8,321	517,418	522,593
2009	342,322	230,138	9,274	577,945	581,734
2010	337,371	184,372	7,907	523,117	529,651

³ Actual GHG emissions were calculated by methods and data available at the time and reported for EPA MRR and internal compliance. Demonstration Workbook Calculated Emissions are results from utilizing current methodologies and input data.

As mentioned previously, GHG emissions and detailed calculations, mathematical equations, input data, and emission factors for the 2006-2010 calendar years are provided in Attachment IV and in hardcopy format as Attachment V.

Attachment I
Chevron Hawaii GHG Emission Reduction Plan
Dated June 30, 2015



Jon Mauer
Refinery Manager

Chevron Products Company
Hawaii Refinery
91-480 Malakole Street
Kapolei HI 96707-1807
Tel 808-682-5711
Fax 808-682-2324
JonMauer@chevron.com

June 30, 2015

CERTIFIED MAIL No. 7014 1820 0000 0357 1755
RETURN RECEIPT REQUESTED

Mr. Nolan Hirai
Manager, Clean Air Branch
Environmental Management Division
919 Ala Moana Boulevard
Honolulu, Hawaii 96814

Chevron Hawaii Refinery
GHG Emission Reduction Plan

Dear Mr. Hirai:

The Chevron Products Company is hereby submitting its Greenhouse Gas Emission Reduction Plan for the Chevron Hawaii Refinery. This plan is being submitted to meet the requirements of §11-60.1-204(a).

If you should have questions or require further information, please contact Kristi Mitchum at (808) 682-3145.

I certify, as the company official having supervisory responsibility for the persons who acting under my direct instructions made the verification, that this knowledge is true, and accurate, and complete to the best of their knowledge, information, and belief.

Sincerely,

A handwritten signature in black ink, appearing to read "Jon Mauer".

kam

Enclosures

**Chevron Hawaii Refinery
GHG Emission Reduction Plan
§11-60.1-204
June 30, 2015**

Introduction

This plan is being submitted in order to meet the requirements of §11-60.1-204(a). The Chevron Hawaii Refinery (Chevron or the Refinery) is located within the Campbell Industrial Park at 91-480 Malakole Street, Kapolei, Hawaii. The facility operates under a Covered Source Permit No. 0088-01-C issued by the Hawaii Department of Health. The Refinery began operation in 1960 with capacity of processing up to 58,000 barrels of crude oil per day. The Refinery has not operated at this rated capacity in recent history but rather sets operations based on market demands. The facility consists of numerous operational units, including crude vacuum and distillation units, fluid catalytic cracker, dimersol, hydrogen manufacturing, alkylation, and isomerization units. The refinery operates utilities including boilers, cogeneration units, effluent treatment plant, and tank fields for storage, blending, and shipping capability in support of its operations.

Chevron has prepared this Greenhouse Gas (GHG) Emission Reduction Plan (the GHG Plan or the Plan) to comply with requirements of the Hawaii Greenhouse Gas Emissions law¹ (the Act) and implementing regulations of the Hawaii Department of Health ("DOH").² The GHG rule³ sets forth the regulatory program for meeting the statutory statewide GHG limit that is equal to or below the 1990 statewide GHG emission levels. The GHG rule generally requires each regulated source to propose a GHG Plan that would cap the source's direct GHG emissions to 16% of that source's 2010 direct GHG emissions. In meeting the GHG limit, the regulation provides flexibility to the Director of the Department of Health, Clean Air Branch (Director or CAB) to set the facility-wide GHG emissions cap for an individual source by varying from the established regulatory structure in two ways: 1) by granting a request to use an alternate emission baseline; and 2) establishing an alternate GHG emission cap based on a finding that the presumptively required 16% reduction is not attainable.

The GHG rule is premised on an assumption that the GHG covered sources reducing their direct GHG levels by 16% from 2010 emission levels will be adequate to return the State of Hawaii to 1990 GHG levels. Although the ultimate goal of the Act is to reduce *statewide* GHG emissions to 1990 emission levels, the Refinery has actually achieved reductions in GHG emissions to less than its estimated 1990 levels and, as a prudent operator, continues to seek these as part of our business. Unlike other sources of GHGs within the state and the selected industries subject to the current GHG rule that have seen growth, and thus increases in GHG emissions since 1990, the Refinery has not experienced sustained increases in capacity and therefore, increased GHG emissions over this same period of time.

¹ HRS §§ 342B *et seq.*, enacted by Act 234, 2007 Hawaii Session Laws.

² HAR § 11-60.1-204, "Greenhouse gas emission reduction plan." Hereinafter, the "GHG rule."

³ HAR §11-60.1-201, Purpose.

Request for Alternate Baseline Annual Emission Year

Section 11-60.1-204(d)(1) generally requires regulated sources to use 2010 to compute the GHG baseline emissions. This paragraph, however, also allows an owner or operator to propose an alternate GHG emission baseline, and includes several potential methodologies to support computation of an acceptable alternative. These alternatives allow an owner or operator to use emissions from the years 2005-2010 in various formulations, if the owner or operator documents that 2010 is "not representative of normal source operations."

Per §11-60.1-204(d)(1)(A)(i), Chevron requests that the Director approve an alternative baseline year of 2009 based on the most representative year during the five-year period ending 2010. Considering the criteria in paragraph (d)(1)(A), 2009 is an appropriate baseline year. Emissions reported for the 2010 reporting year do not accurately reflect normal operation which resulted in less GHG emissions. An analysis of the Refinery operations during the 5-year period ending in 2010 demonstrate that the 2009 reporting year is more representative of current operations and anticipated future operations than the 2010 reporting year. In 2010, the Refinery conducted a major plant turnaround of its Fluid Catalytic Cracker (FCC) unit. The result of this maintenance event significantly reduced the GHG emissions for the 2010 calendar year making the use of the 2010 calendar year as a baseline not representative of normal and continuous operation. In 2009, Refinery operations were continuous. Chevron has been estimating GHG emissions internally for several years prior to the GHG Reporting Rule requirement. The 2009 emission calculations are representative and comparable to the 2010 reporting year calculation methodology.

Direct GHG emission estimates for the proposed 2009 baseline year are 581,734 metric tons per year (tpy) of carbon dioxide equivalent (CO₂e). Table 1. GHG Annual Emission Summary indicates the direct GHG emissions estimated for the 1990 calendar year as well as the calculated 2009 and 2010 calendar years. The 1990, 2009, and 2010 calendar years were calculated using the methodologies as required by the GHG Reporting Rule in 40 CFR Part 98; however, estimates were used some operational data that was unavailable for the 1990 calendar year

Table 1. GHG Annual Emission Summary

Calendar Year	Direct emissions reported in metric tons per year of CO ₂ e
1990	613,900 (estimated)
2009 (baseline year)	581,734
2010	529,651

2020 Facility-Wide Direct GHG Emissions Cap

Per §11-60.1-204(d)(2), the regulation requires a 16% reduction from the proposed 2009 baseline year which would equate to a reduction of 93,077 metric tpy CO₂e and an emissions cap of 488,657 metric tpy CO₂e. For this facility, a reduction of this size is not attainable for long term sustainability of the Refinery.

The Refinery proposes a direct GHG emissions cap of 569,000 tons CO₂e. This is equivalent to a 7.3% reduction in direct GHG emissions since 1990 (or 44,900 tpy of CO₂e) or a 2.2% (or 12,734 tpy of CO₂e) reduction from the baseline year of 2009. Since 2009, the Refinery implemented several energy efficiency measures, and consequently, reduced GHG emissions below this proposed cap. However, these GHG emission reductions were incidental to the intended benefits of the various projects. Those GHG reductions were never intended to be considered an enforceable GHG limit in the refinery Covered Source Permit and are not necessarily permanent.

Minimal decreases, as discussed below, may be attainable but anything greater would not survive the economic impact analysis that the rule requires in §11-60.1-204(d)(5).

GHG Control Assessment

Per §11-60.1-204(d)(2), the GHG rule requires each affected source to conduct a GHG control assessment. The Refinery has reviewed the available control measures identified §11-60.1-204(d)(3), as well as other sources including available EPA guidelines for GHG Best Available Control Technology. These included "Available and Emerging Technologies for Reducing Greenhouse Gas Emissions from the Petroleum Refining Industry", EPA Office of Air and Radiation, October 2010 and "Available and Emerging Technologies for Reducing Greenhouse Gas Emissions from Industrial, Commercial, and Institutional Boilers", EPA Office of Air and Radiation, October 2010.

Chevron has conducted a GHG control assessment of these control measures and has included the technical feasibility, control effectiveness, and cost evaluation of each measure. A summary of this information is provided in Table 2. GHG Control Assessment. Please note that the refinery already has a many of these measures in place and has noted this where applicable.

Proposed Control Strategy

Per §11-60.1-204(d)(6), the regulation requires each affected source to propose a control strategy to include a listing of identified control measures that can be implemented in order to meet the required or proposed alternate 2020 facility-wide GHG emissions cap.

From 1990 to present, Chevron Hawaii Refinery has completed many control measures that have attributed to the reduction of direct GHG emissions.

- Economizers were installed on the 2 crude furnaces in 1993,
- In 1999, the boiler feed water preparation system (hot lime water) was replaced with reverse osmosis which treats wastewater from the City and County of Honolulu's Honouliuli wastewater treatment plant,
- Control and operational improvements were realized with the new FCC reactor which was replaced in 2003 which also included flare reductions,
- In 2005, the cooling tower motorization was completed,
- In 2006, a flare gas recovery system was installed to recover waste gases being routed to the flare for destruction which is now used for energy recovery; and,
- As part of the Energy Project which began in the early 2000's, Chevron built a new cogeneration unit (Cogen #4) which allows the refinery to optimize its energy use and steam generation. This project included motorization of the Alky plant compressor in April 2013 which enabled full utilization of 4 cogen units. The project also included replacement of three existing boilers with two more energy efficient boilers. A revision of the permit limits for the boilers is pending and the ultimate shutdown of the original three boilers will achieve further reductions in direct GHG emissions.

Since 1990, the Refinery has not expanded nor increased its rated production capacity, nor has the Refinery operated at its maximum permitted rate in the allowable baseline years (2006 through 2010). In fact, Chevron has made significant progress by continuing to evaluate and integrate energy efficiency projects as well as operational best practices which have resulted in lowering GHG emissions for the refinery and the state of Hawaii.

These reductions and other optimization projects have reduced the refinery's Direct GHG emissions by 7.3% since 1990.

Chevron continues to evaluate energy efficiency measures to streamline its cost of operation as well as reducing emissions of GHG. However, cost efficient measures resulting in large reductions in energy consumption and subsequent direct GHG emissions have already been utilized by the Refinery. Additional control measures have been evaluated utilizing a cost per ton methodology similar to Best Achievable Control Technology (BACT). Similar BACT exercises for GHG have been performed within the US resulting in a \$20 per ton (CO₂e basis) threshold for refineries. Reference: US EPA Region 8 Response to Comments for Sinclair Wyoming Refinery's PSD permit March 21, 2013; PSD permit for Flint Hills Corpus Christi West Refinery April 2014]. In addition, recent regulations like the Heater and Boiler MACT have energy assessment criteria that would only include projects that have payback within 2 year or less.

Utilizing this information, Chevron's GHG control assessment does not yield any additional future projects that result in significant direct GHG emissions reductions given the practical and technical feasibility and cost effectiveness considerations. A waterfall diagram depicting Chevron's GHG emission history including historical projects and the impact of current planned reductions is shown in Chart 1. Waterfall Diagram of GHG Control Assessment. Projects will continue to be evaluated for future emission reductions and future business needs.

Table 2. GHG Control Assessment

§11-60.1-204(d)(3)		§11-60.1-204(d)(5)(A) through G							
§11-60.1-204(d)(4)		Control Effectiveness and Cost Evaluation							
GHG Control Measure	Applicable Source Type	Technically Feasible Measures (eliminate all technically infeasible options based on physical, chemical, or engineering principles)	(A) Control Effectives (% of pollutant removed)	(B) Expected emission rate (tons per year CO2e, pounds CO2e/kilowatt-hour)	(C) Expected emission reduction (tons per year CO2e)	(D) Energy impacts (BTU, kilowatt-hour)	(E) Environmental impacts (other media and the emissions of other regulated air pollutants)	(F) Any secondary emissions or impacts resulting from the production or acquisition of the control measure	(G) Economic impact (cost effectiveness: annualized control cost, \$/megawatt-hr, \$/ton CO2e removed, and incremental cost effectiveness between the control and status quo)
(A) GHG Capture and Control									
Carbon dioxide capture and storage (CCS)		Technically infeasible Physical: CO2 storage in local geologic formations (volcanic formations) is not feasible. Engineering: Techno-economic studies indicate that CCS is not likely to be economically feasible below about 1,000,000 tonnes per year of capture, particularly if the carbon dioxide cannot be used for enhanced oil recovery	N/A	N/A	N/A	N/A	N/A	N/A	N/A
(B) Fuel Switching or Cofiring									
Co-firing	Fuel-fired sources (including boilers, furnaces)	Technically feasible Actual: Boiler F-5201 is currently operated on a combination of fuel oil and refinery fuel gas.	2%	118,831	1,853	1	Reduction in criteria pollutant emissions	Additional emissions for storage of secondary fuel	\$162
Fuel Switching	Fuel-fired sources (including boilers, furnaces, and cogens)	Technically feasible Not Considered: Fuel switching is not cost effective.	19.5% reduction in CO2	26,425	6,398	No Change	Reduction in criteria pollutant emissions	Additional emissions for storage of secondary fuel	\$547
(C) Energy efficiency upgrades									

§11-60.1-204(d)(3)		§11-60.1-204(d)(4)		§11-60.1-204(d)(5)(A through G)						
GHG Control Measure	Applicable Source Type	Technically Feasible Measures (eliminate all technically infeasible options based on physical, chemical, or engineering principles)	(A) Control Effectiveness (% of pollutant removed)	(B) Expected emission rate (tons per year CO2e, pounds CO2e/kilowatt-hour)	(C) Expected emission reduction (tons per year CO2e)	(D) Energy impacts (BTU, kilowatt-hour)	(E) Environmental impacts (other media and the emissions of other regulated air pollutants)	(F) Any secondary emissions or impacts resulting from the production or acquisition of the control measure	(G) Economic impact (cost effectiveness: annualized control cost, \$/megawatt-hr, \$/ton CO2e removed, and incremental cost effectiveness between the control and status quo)	
Replace equipment	Boilers	Technically feasible. Current Plan: Boilers F-5201, F-5202, and F-5203 will be replaced with Boilers F-5205 & F-5206 in 2016.	9.80%	45,437	4,940	100	Reduction in criteria pollutant emissions	None	Boiler construction is complete. Permit is pending.	
Replace/ upgrade burners	Furnaces	Technically feasible Not Considered: Replacing or upgrading burners is not cost effective.	0.60%	144,520	903	4	Reduction in criteria pollutant emissions	None	\$554	
Cogeneration Actual: Cogens 1, 2, and 3 are installed and operational. Cogen 4 was installed and operational as of 2010.										
Instrumentation and controls (improve process monitoring and control systems)	Furnaces, boilers, cogens	Technically feasible Actual: Refinery furnaces, boilers, and cogens are currently equipped with instrumentation and controls to improve process monitoring. Not Considered: Additional instrumentation and controls are not cost effective.	0.20%	237,022	451	2	None	Additional LDAR regulated components	\$1,109	
Economizer	Boilers	Actual: Boilers (F-5201, F-5202, F-5203, F-5205, and F-5206) have economizers. Crude furnaces (F-5150 and F-5153) were equipped with economizers in 1993.								
Technically feasible										

Table 2. GHG Control Assessment

§11-60.1-204(d)(3)		§11-60.1-204(d)(5)(A through G)						
Applicable Source Type		Control Effectiveness and Cost Evaluation						
GHG Control Measure	Technically Feasible Measures (eliminate all technically infeasible options based on physical, chemical, or engineering principles)	(A) Control Effectiveness (% of pollutant removed)	(B) Expected emission rate (tons per year CO2e, pounds CO2e/kilowatt-hour)	(C) Expected emission reduction (tons per year CO2e)	(D) Energy Impacts (BTU, kilowatt-hour)	(E) Environmental Impacts (other media and the emissions of other regulated air pollutants)	(F) Any secondary emissions or impacts resulting from the production or acquisition of the control measure	(G) Economic impact (cost effectiveness: annualized control cost, \$/megawatt-hr, \$/ton CO2e removed, and incremental cost effectiveness between the control and status quo)
Heat Recovery: Air Preheater	Furnaces, boilers, cogens Actual: Crude furnaces (F-5150 and F-5153) and boilers (F-5201, F-5202, F-5203, F-5205, and F-5206) have air preheat. Not Considered: Additional air preheat capability is not cost effective at this time.	0.60%	85,257	500	20	None	May increase NOx emissions (2)	\$10,000
Power/ waste heat recovery	Actual: Furnaces have waste heat recovery.							
Create turbulent flow within fire tubes	Not applicable. The refinery does not operate fire tubes.							
Capture energy from boiler blowdown	Actual: Boiler blowdown system exchanges heat with RO water.							
	Technically feasible							
	Actual: Condensate return system in place and operational.							

Table 2. GHG Control Assessment

§11-60.1-204(d)(3)		§11-60.1-204(d)(5)(A through G)							
GHG Control Measure	Applicable Source Type	Technically Feasible Measures (eliminate all technically infeasible options based on physical, chemical, or engineering principles)	(A) Control Effectiveness (% of pollutant removed)	(B) Expected emission rate (tons per year CO ₂ e, pounds CO ₂ e/kilowatt-hour)	(C) Expected emission reduction (tons per year CO ₂ e)	(D) Energy impacts (BTU, kilowatt-hour)	(E) Environmental impacts (other media and the emissions of other regulated air pollutants)	(F) Any secondary emissions or impacts resulting from the production or acquisition of the control measure	(G) Economic impact (cost effectiveness: annualized control cost, \$/megawatt-hr, \$/ton CO ₂ e removed, and incremental cost effectiveness between the control and status quo)
Condensate return system		Under Evaluation: Improvements to condensate recovery are under evaluation but are not cost effective at this time.	2.20%	58,416	1,338	13	None	None	\$374
Motorization projects (use high efficiency motors; use variable speed drives)	Steam-driven motors (MAB or Wet Gas Compressor)	Technically feasible Actual: Completed motorization of Alky Compressor in 2013 and Cooling Tower in 2005.	9.50%	212,467	25,006	70	Reduction in criteria pollutant emissions	Increase emissions for HECO	Complete
Optimize compressed air systems	Optimization of existing air compressors	Technically feasible Not Considered: Optimization of existing air compressors is not cost effective.	0.01%	237,457	16	1	None	None	\$31,250
Power/ waste heat recovery		Actual: Already in place for furnaces.							
(D) Combustion and operational improvements		Technically feasible							

§11-60.1-204(d)(3)		§11-60.1-204(d)(5)(A through G)						
Applicable Source Type		Control Effectiveness and Cost Evaluation						
GHG Control Measure	Technically Feasible Measures (eliminate all technically infeasible options based on physical, chemical, or engineering principles)	(A) Control Effectiveness (% of pollutant removed)	(B) Expected emission rate (tons per year CO2e, pounds CO2e/kilowatt-hour)	(C) Expected emission reduction (tons per year CO2e)	(D) Energy impacts (BTU, kilowatt-hour)	(E) Environmental impacts (other media and the emissions of other regulated air pollutants)	(F) Any secondary emissions or impacts resulting from the production or acquisition of the control measure	(G) Economic impact (cost effectiveness: annualized control cost, \$/megawatt-hr, \$/ton CO2e removed, and Incremental cost effectiveness between the control and status quo)
Tuning (optimizing excess oxygen)	Furnaces, boilers, cogens Under Evaluation: Furnace tuning is under evaluation but is not cost effective at this time.	0.80%	235,667	1,806	12	Reduction in NOx emissions	Low excess air may lead to increased CO emissions	\$277
Optimization	Furnaces, boilers, cogens Covered under instrumentation and Controls - Energy Efficiency - as well as Tuning above							
Reduce air leakages	Technically feasible Under Evaluation: Reducing air leakages is under evaluation but is not cost effective at this time.	0.66%	235,890	1,583	5	Reduction in criteria pollutant emissions	None	\$190
Reduce steam trap leaks	Technically feasible Actual: Program in place at refinery to reduce steam trap leaks.	0.14%	237,140	333	3	Reduction in criteria pollutant emissions	None	\$150
Insulation/insulating jackets	Technically feasible Under Evaluation: Insulation improvements are under evaluation.	0.50%	236,286	1187	10	Reduction in criteria pollutant emissions	None	\$126
	Technically feasible							

Table 2. GHG Control Assessment

\$11-60.1-204(d)(3)		\$11-60.1-204(d)(4)		\$11-60.1-204(d)(5)(A through G)						
GHG Control Measure	Applicable Source Type	Technically Feasible Measures (eliminate all technically infeasible options based on physical, chemical, or engineering principles)	(A) Control Effectiveness (% of pollutant removed)	(B) Expected emission rate (tons per year CO2e, pounds CO2e/kilowatt-hour)	(C) Expected emission reduction (tons per year CO2e)	(D) Energy Impacts (BTU, kilowatt-hour)	(E) Environmental Impacts (other media and the emissions of other regulated air pollutants)	(F) Any secondary emissions or impacts resulting from the production or acquisition of the control measure	(G) Economic impact (cost effectiveness: annualized control cost, \$/megawatt-hr, \$/ton CO2e removed, and incremental cost effectiveness between the control and status quo)	
Reduce slagging and fouling of heat transfer surfaces (Furnace tube coatings)	Furnaces, boilers	Not Considered: The addition of furnace tube coatings is not cost effective.	0.02%	63,366	10	0.12	Reduction in criteria pollutant emissions	None	\$10,000	
Furnace cleaning during turnarounds	Actual: Furnace cleaning is performed during turnarounds.									
FCC surface condenser ejector cleaning	Actual: FCC surface condenser ejector cleaning is performed.									
Manage steam letdown	Actual: Refinery manages steam letdown.									
Implement lighting system efficiency improvements	Refinery-wide	Not Considered: Implementing lighting system efficiency improvements is not cost effective.	0.01%	237462	11	0.1	None	None	\$909	
		Technically feasible								
		Technically feasible								

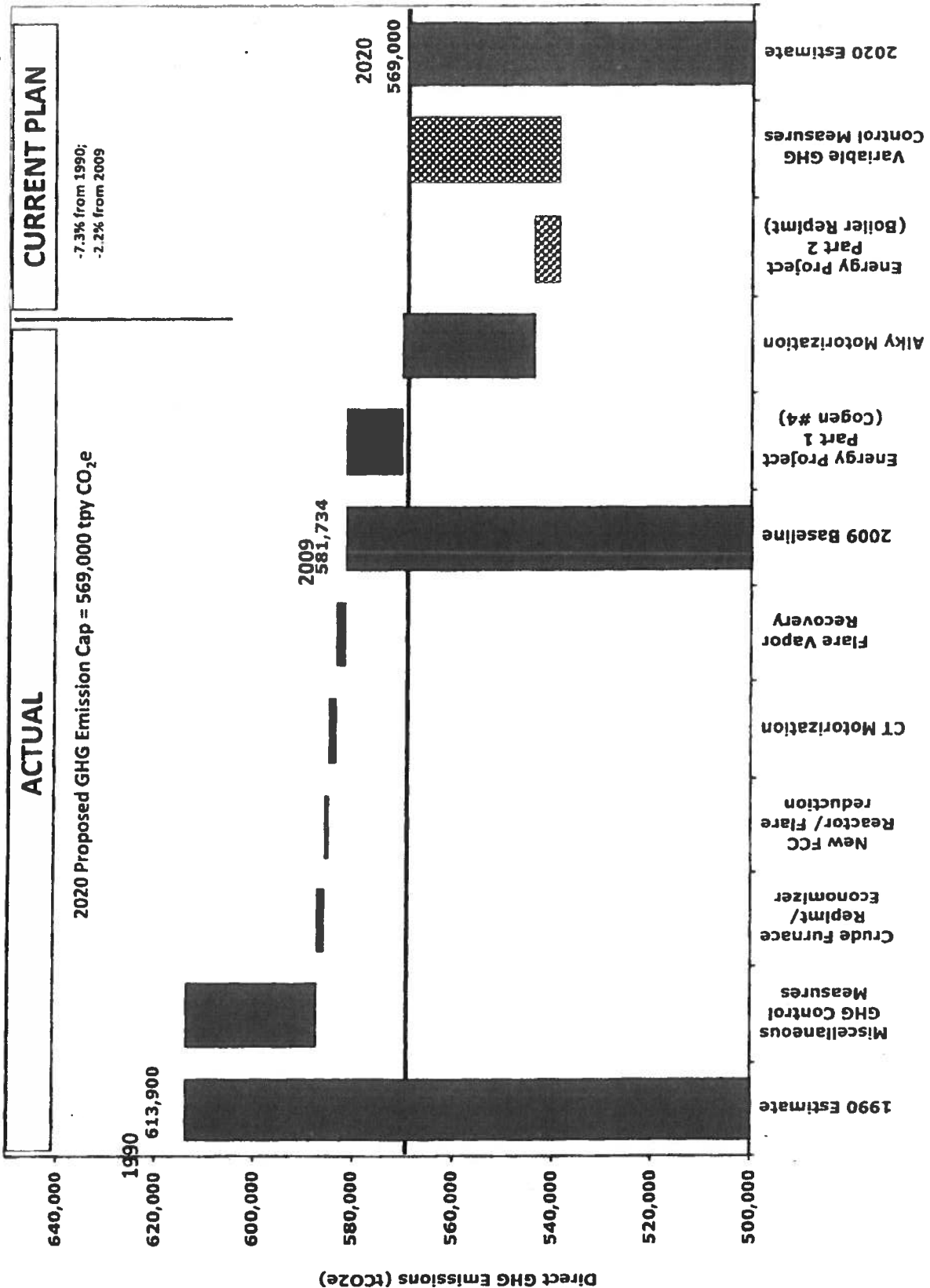
Table 2. GHG Control Assessment

\$11-60.1-204(d)(3)		\$11-60.1-204(d)(4)		\$11-60.1-204(d)(5)(A through G)						
GHG Control Measure	Applicable Source Type	Technically Feasible Measures (eliminate all technically infeasible options based on physical, chemical, or engineering principles)	(A) Control Effectiveness (% of pollutant removed)	(B) Expected emission rate (tons per year CO2e, pounds CO2e/kilowatt-hour)	(C) Expected emission reduction (tons per year CO2e)	(D) Energy impacts (BTU, kilowatt-hour)	(E) Environmental impacts (other media and the emissions of other regulated air pollutants)	(F) Any secondary emissions or impacts resulting from the production or acquisition of the control measure	(G) Economic impact (cost effectiveness: annualized control cost, \$/megawatt-hr, \$/ton CO2e removed, and incremental cost effectiveness between the control and status quo)	
										(A) Control Effectiveness (% of pollutant removed)
Online Furnace Cleaning	Furnaces	Under Evaluation: Programs to incorporate online furnace cleaning are under evaluation but are not cost effective at this time.	0.14%	237,140	333	2	None	None	\$180	
(E) Restrictive operation										
Minimize use of import electricity	HECO	Actual: Refinery optimizes use of cogens and boilers for energy efficiency to minimize use of import electricity.								
Optimize FCC preheat furnace	FCC Preheat Furnace	Technically feasible Under Evaluation: Optimization of FCC preheat furnace operation is under evaluation.	25%	300	100	1	Reduction in criteria pollutants	None	\$100	
Refinery turnaround	Refinery-wide	Technically feasible Not Considered: Refinery turnaround is not cost effective.	13%	207473	30,000		Reduction in criteria pollutants	None	> \$1,000	
Reduce steam vents on reboilers		Technically feasible Under Evaluation: Reboiler vent reduction efforts are under evaluation but not cost effective at this time.	0.31%	236,733	740	5	None	None	\$68	
(F) Planned upgrades, overhaul or retirement of equipment										

Table 2. GHG Control Assessment

§11-60.1-204(d)(3)		§11-60.1-204(d)(4)							§11-60.1-204(d)(5)(A through G)							
GHG Control Measure	Applicable Source Type	Technically Feasible Measures (eliminate all technically infeasible options based on physical, chemical, or engineering principles)	(A) Control Effectiveness (% of pollutant removed)	(B) Expected emission rate (tons per year CO2e, pounds CO2e/kilowatt-hour)	(C) Expected emission reduction (tons per year CO2e)	(D) Energy Impacts (BTU, kilowatt-hour)	(E) Environmental impacts (other media and the emissions of other regulated air pollutants)	(F) Any secondary emissions or impacts resulting from the production or acquisition of the control measure	(G) Economic Impact (cost effectiveness: annualized control cost, \$/megawatt-hr, \$/ton CO2e removed, and incremental cost effectiveness between the control and status quo)							
Included in line items above and below.																
(G) Outstanding regulatory mandates, emission standards and binding agreements																
Heater and Boiler MACT	Furnaces, Boilers	Energy assessments for applicable sources are required to be completed by January 31, 2016. Impacts of this regulation are included in line items above.														
NSPS Ja	Furnaces	Flare monitoring equipment and flare monitoring plan are required to be completed by November 11, 2015. Impacts of this regulation are included in line items above.														
Tier 3 Gasoline	Furnaces	Technically feasible Current Plan: Refinery plans to meet the sulfur specifications for Tier 3 gasoline by 2020.	↑ 1.00%	↑ 239873	↑ 2400	↑ 16	↑ Increase in criteria pollutant emissions	Unknown	↑ Increase in CO2 emissions							
(H) Other GHG reduction initiatives that may affect the facility's GHG emissions																
Leak detection and repair		Actual: Refinery complies with existing leak detection and repair regulatory requirements.														
Flare gas recovery		Actual: Refinery installed flare gas recovery in 2006.														

Chart 1. Waterfall Diagram of GHG Control Assessment



Attachment II
DOH Letter Requesting Additional Information
Dated February 10, 2016

DAVID Y. IGE
GOVERNOR OF HAWAII



VIRGINIA PRESSLER, M.D.
DIRECTOR OF HEALTH

STATE OF HAWAII
DEPARTMENT OF HEALTH
P.O. Box 3378
HONOLULU, HAWAII 96801-3378

In reply please refer to
File:

16-071E CAB
File No. 0088

February 10, 2016

Ms. Kristi Mitchum
HES Manager
Chevron Products Company
Hawaii Refinery
91-480 Malakole Street
Kapolei, Hawaii 96707-1807

Dear Ms. Mitchum:

SUBJECT: Greenhouse Gas (GHG) Emissions Reduction Plan
Covered Source Permit (CSP) Nos. 0088-01-C, 0088-02-C, and 0088-03-C
Chevron Products Company
Hawaii Refinery
Located At: 91-480 Malakole Street, Kapolei, Oahu

The Department of Health, Clean Air Branch (CAB), completed an initial review of your GHG Emissions Reduction Plan and determined that additional information is needed for the plan. Please refer to the enclosed attachment and Compact Disk (CD) for the requested information.

Pursuant to the Hawaii Administrative Rules §11-60.1-204(e), the CAB requests that the additional information be provided by **April 8, 2016**.

If you have any questions, please contact Mr. Keith McFall of my staff at (808) 586-4200.

Sincerely,

A handwritten signature in black ink, appearing to read "Nolan S. Hirai".

NOLAN S. HIRAI, P.E.
Manager, Clean Air Branch

KM:mah

Enclosures

Chevron Products Company
Greenhouse Gas Emissions Reduction Plan (GHGERP)
Hawaii Refinery
CSP Nos. 0088-01-C, 0088-02-C, and 0088-03-C
February 10, 2016

ATTACHMENT

Please provide the following information and/or clarifications:

- 1) Table 1 of your GHGERP presents GHG emissions from the Chevron Products Company, Hawaii Refinery for calendar years 2009 and 2010 to provide information on an appropriate baseline level for the GHG emissions cap. These results were compared with GHG emissions based on fuel consumption data from annual emission reports submitted to the CAB for calendar years 2009 and 2010. The results show emissions based on Chevron's fuel burning data account for about half of the total GHG emissions in Table 1 of your GHGERP. Thus, the detailed GHG emissions information provided in the GHGERP appears crucial to accurately estimating GHG emissions. The CAB requests confirmation on whether or not fuel burning data alone is sufficient to determine GHG emissions.
- 2) Pursuant to Hawaii Administrative Rules §11-60.1-204(d)(1)(A), the owner or operator shall clearly document why calendar year 2010 is not representative of normal operations and why the proposed alternate year or period is more suitable based on trends, existing equipment and controls, scheduled maintenance, operational practices, and any other relevant information.

The "Request for Alternate Baseline Annual Emission Year" section of your GHGERP discusses a proposed 2009 alternative baseline year and presents Chevron's associated justification and rationale and states:

Statement #1: "Considering the criteria in paragraph (d)(1)(A), 2009 is an appropriate baseline year. Emissions reported for the 2010 reporting year do not accurately reflect normal operation which resulted in less GHG emissions. An analysis of the Refinery operations during the 5-year period ending in 2010 demonstrate that the 2009 reporting year is more representative of current operations and anticipated future operations than the 2010 reporting year. In 2010, the Refinery conducted a major plant turnaround of its Fluid Catalytic Cracker (FCC) unit. The result of this maintenance event significantly reduced the GHG emissions for the 2010 calendar year making the use of the 2010 calendar year as a baseline not representative of normal and continuous operation. In 2009, Refinery operations were continuous. Chevron has been estimating GHG emissions internally for several years prior to the GHG Reporting Rule requirement. The 2009 emission calculations are representative and comparable to the 2010 reporting year calculation methodology."

Statement #2: "Direct GHG emission estimates for the proposed 2009 baseline year are 581,734 metric tons per year (tpy) of carbon dioxide equivalent (CO₂e). Table 1. GHG Annual Emission Summary indicates the direct GHG emissions estimated for the 1990 calendar year as well as the calculated 2009 and 2010 calendar years."

The CAB examined the information provided in your GHGERP and identified the following items:

- a) Statement#1 indicates that facility GHG emissions for calendar year 2010 are not representative of normal operations due to operations associated with the FCC unit, and that facility emissions associated with calendar year 2009 are "more representative of current operations and anticipated future operations than the 2010 reporting year." The GHGERP did not include the "analysis of Refinery operations" associated with your calendar year 2006 through 2010 GHG emissions. It did not quantify the significance of the "major plant turnaround" of the FCC unit relative to other changes in operations that occurred during the 2006 to 2010 period. The CAB examined annual fuel burning data associated with the Chevron Refinery, including calendar years 2006 through 2010, and calculated the annual heat content associated with the FCC Furnace (Unit F5300) for this period. Please see Table A-1 below. Presuming these results are correct, there does not appear to be a significant difference between the values for 2009 and 2010. However, as shown in Table A-1, relative to the 5-year mean value of 96,011 MMBTU, there is significant reduction in energy use for the FCC between the 2006 to 2007 years (~ 142% of the mean) and the 2009 to 2010 years (~ 61% of the mean).

	2006	2007	2008	2009	2010
	(MMBTU)	(MMBTU)	(MMBTU)	(MMBTU)	(MMBTU)
FCC Unit No. F5300	136,305	136,553	89,606	59,897.4	57,694
% of 5-year mean ^a	142.0%	142.2%	93.3%	62.4%	60.1%

a. Percentage of the average 96,011 MMBtu energy use between 2006 and 2010.

Total MMBtu per year energy use associated with all annual fuel consumption was also calculated. Please see Table A-2 below. Presuming these results are correct, there does not appear to be a significant difference in energy use for the Chevron Refinery between 2008 and 2010. Relative to the 5-year mean value of 4,561,312 MMBTU, the variations are relatively small compared to those shown in Table A-1 for the FCC Furnace. In addition, since the FCC's MMBtu energy use is only a few percent of Chevron Refinery's total energy use for fuel burning, and the energy use from burning fuel appears to contribute only about half of the total GHG emissions for the facility, without additional explanation and quantification, it is not clear that FCC operations are representative of your facility's annual GHG emissions.

	2006	2007	2008	2009	2010
	(MMBTU)	(MMBTU)	(MMBTU)	(MMBTU)	(MMBTU)
All	4,649,600	4,968,139	4,392,463	4,490,778	4,305,579
% of 5-year mean ^a	101.9%	108.9%	96.3%	98.5%	94.4%

a. Percentage of the average 4,561,312 MMBtu energy use between 2006 and 2010.

The GHGERP identified the "major plant turnaround" of the FCC unit as the reason for the assertion that calendar year 2010 was not representative of normal operations. However, the GHGERP does not include the supporting data, analysis,

and results needed to assess this claim. The CAB's evaluation of energy use by your facility does not appear to validate the claim either. The CAB, therefore, requests additional information to document FCC unit operation as the means to evaluate the relative suitability of calendar years 2006 through 2010 as an appropriate representation of baseline GHG emissions. For the purpose of establishing trend information, the CAB requests similar information for calendar years 2011 through 2014.

- b) Statement#1 indicates that the "major plant turnaround" of the FCC unit during 2010 resulted in annual CO₂e emission levels that were not representative of "normal operations". It is unclear to what extent this shutdown resulted in annual refining activity failing to meet planned levels, and thus annual CO₂e emissions that would not be representative of "normal operations." It is also unclear to what extent the annual impact of the "major plant turnaround" was mitigated by production before and after the shutdown. As such, the CAB requests a discussion of pre and post shutdown mitigation efforts, and the estimated net impact that this shutdown had on annual Refinery operations for 2010 versus that for 2006, 2007, 2008, and 2009.
- c) Statement#1 indicates that an analysis of Refinery operations for the years 2006 – 2010 was performed. While the GHGERP only addresses operations associated with the FCC unit, it is unclear if the analysis identified other factors useful for the assessment of whether calendar year 2010 is representative of normal operations. It is unclear if the analysis considered differences between planned and actual annual production in the assessment of "normal operations." The CAB requests additional information, if available, from the analysis to evaluate the relative suitability of calendar years 2006 through 2010 as representative of baseline GHG emissions. Please include discussions of associated mitigation efforts, and the estimated net impact of any other factors on annual refining activity for 2010 versus that for 2006, 2007, 2008, and 2009. For the purpose of establishing trend information, the CAB requests similar information for calendar years 2011 through 2014.
- d) Statement#2 presents the annual GHG emissions for the facility in 2009, but the GHGERP does not include the supporting documentation needed to confirm your results. Table 1 in your GHGERP includes 2010 GHG emissions for the facility, and this value appears to match the facility total reported in the EPA Facility Level Information on GHGs Tool (FLIGHT) at: <http://ghgdata.epa.gov/ghgp/main.do>. However, it is unclear if the annual GHG emissions for calendar years 2009 and 2010 were calculated in a consistent manner. For example, the 2010 value has not been corrected to reflect the current greenhouse gas global warming potentials (GWPs) for methane (CH₄) and nitrous oxide (N₂O). To assist in the evaluation of the relative suitability of emission years 2006 – 2010 for establishment of baseline GHG emissions, the CAB requests that you provide the refinery's annual GHG emissions with supporting information and spreadsheet calculations for calendar years 2006, 2007, 2008, 2009, and 2010. Please ensure that the information provided for the annual GHG emission inventories has sufficient detail to enable validation of the calculations. The CAB requests that any inconsistencies in year to year GHG calculation methods be discussed and their impact quantified.
- e) To assist in the evaluation of operating trends, annual GHG emissions information for calendar years 2011 through 2014 is also needed. For the 2011 through 2014 GHG inventories, the CAB requests that you provide confirmation that the EPA

GHG Reporting Program CO₂e information available at EPA's FLIGHT website (<http://ghgdata.epa.gov/ghgp/main.do>) are accurate, and consistent with the 2006 – 2010 annual GHG emissions discussed previously. The CAB requests that any causes of inaccuracy or inconsistency (e.g., data quality, data source, calculation methods) be discussed and their impact quantified. The CAB requests the submission of updated data and calculations if revisions are needed to ensure accuracy or consistency. Note that the CAB used updated GWPs from the EPA Emission Factor Hub website (<http://www.epa.gov/climateleadership/center-corporate-climate-leadership-ghg-emission-factors-hub>) to correct for the change in GWPs that occurred during the reporting periods. As can be seen in the Table A-3 below, these corrections are insignificant in magnitude.

Table A-3. EPA FLIGHT Annual GHG emissions for Chevron Refinery with GWP Corrections

GHG Summary Report: http://ghgdata.epa.gov/ghgp/main.do	Chevron Refinery	2010	2011	2012	2013	2014
CO ₂ equivalent emissions from facility subparts C-II, SS, and TT	Metric Tons	529,650.8	560,055.7	568,094.9	462,620.6	536,124.3
CO ₂ equivalent emissions from supplier subparts LL-QQ	Metric Tons	0.0	0.0	0.0	0.0	0.0
Biogenic CO ₂ emissions from facility subparts C-II, SS, and TT	Metric Tons	0.0	0.0	0.0	0.0	0.0
Reported Total (no GWP corrections)	Metric Tons	529,650.8	560,055.7	568,094.9	462,620.6	536,124.3
Calculated Total (April 2014 GWP)	Metric Tons	529,748.0	560,159.2	568,194.4	462,620.6	536,124.3
Difference (Reported - Calculated)	Metric Tons	-97.2	-103.5	-99.5	0.0	0.0
% Difference	%	-0.01835%	-0.01848%	-0.01752%	-0.00001%	-0.00001%

- f) This initial CAB review examined fuel burning data from annual emissions inventory submissions for calendar years 2006 – 2014. Seven fuels with possible erroneous heat content information were identified. They are summarized below in Table A-4 and documented in more detail in the file "Chev-Ref-2009-review-9.xlsx" located on the enclosed CD. Please see Sheets "2-Review Comments" and "3- ProcessesHeatCO₂." The CAB requests confirmation and explanation, or correction of these values.

Table A-4. Fuels with Possible Erroneous Heat Content Information

Emission Year	Fuel Type	Fuel Material Code	SCC	Fuel Heat Content (Annual Ave.)	Fuel Heat Content Unit Numerator	Fuel Heat Content Unit Denominator	Review Comments:
2013	Refinery Gas	553	30600106	1.129	E6BTU	E6FT35	The "Fuel Heat Content Unit Denominator" changed from "E3BTU" to "E6BTU" after 2012. It is unclear if the "Throughput" values are consistent with "E6BTU". See Sheet "3- ProcessesHeatCO ₂ " for CAB fuel burning related GHG emissions estimates.
2013	Liquid Petroleum Gas (LPG)	178	30600107	91.5	E6BTU	E6BTU	The "Fuel Heat Content Unit Denominator" appears to be incorrect for this case. A corrected value of E3GAL seems plausible. It is unclear if the "Throughput" value and unit are consistent with this heat content unit.
2013	Refinery Gas	553	20200701	1.129	E6BTU	E6FT35	The "Fuel Heat Content Unit Denominator" changed from "E3BTU" to "E6BTU" after 2012. It is unclear if the "Throughput" values are consistent with "E6BTU".
2013	Refinery Gas	553	20200701	111.022	E6BTU	E6FT35	It appears that the "Fuel Heat Content" for Refinery Gas and Gasoline have been swapped. A corrected value of 1.129 E6BTU/E3FT35 seems plausible. Also, the "Fuel Heat Content Unit Denominator" changed from "E3BTU" to "E6BTU" after 2012. It is unclear if the "Throughput" values are consistent with "E6BTU".
2013	Gasoline	127	20201701	1.129	E6BTU	E3GAL	It appears that the "Fuel Heat Content" for Refinery Gas and Gasoline have been swapped. A corrected value of 111.022 E6BTU/E3GAL seems plausible.
2014	Refinery Gas	553	30600106	1.057	E6BTU	E6FT35	The "Fuel Heat Content Unit Denominator" changed from "E3BTU" to "E6BTU" after 2012. It is unclear if the "Throughput" values are consistent with "E6BTU".
2014	Refinery Gas	553	20200701	1.057	E6BTU	E6FT35	The "Fuel Heat Content Unit Denominator" changed from "E3BTU" to "E6BTU" after 2012. It is unclear if the "Throughput" values are consistent with "E6BTU".

For your written response to our request for additional information, the CAB also requests that you provide emissions inventory data and supporting calculations in an excel spreadsheet format to enable us to verify your results. Please email the requested information to CAB.Emissions@doh.hawaii.gov. Also mail a hardcopy of the requested information to:

Clean Air Branch
Hawaii Department of Health
919 Ala Moana Boulevard, Room 203
Honolulu, Hawaii 96814

Attachment III
Chevron letter with Preliminary Recommendation
Dated June 30, 2016



Kristi Mitchum
HES Manager

Chevron Products Company
Hawaii Refinery
91-480 Malakole Street
Kapolei HI 96707-1807
Tel 808-682-3145
Fax 808-682-2324
Kristi.Mitchum@chevron.com

June 30, 2016

**CERTIFIED MAIL No. 7015 0640 0003 9266 0915
RETURN RECEIPT REQUESTED**

Mr. Nolan Hirai
Manager, Clean Air Branch
Environmental Management Division
919 Ala Moana Boulevard
Honolulu, Hawaii 96814

**Chevron Hawaii Refinery
GHG Emission Reduction Plan – Additional Information Request**

Dear Mr. Hirai:

Per your May 27, 2016 request, we are providing a preliminary recommendation for a revised set of information regarding our GHG Emissions Reduction Plan (GHGERP). The recommendations below address the remaining items, originally requested in the Department of Health, Clean Air Branch (CAB) letters dated February 10, 2016 and April 20, 2016. We appreciate your staff's efforts to help clarify the questions concerning the refinery's GHGERP, submitted June 30, 2015.

As indicated in the table below, the refinery has addressed the requested information in items 1, 2 (b), 2(c), 2(e), and 2(f). We plan to provide the information described for items 2(a) and 2(d) below.

Referenced Line Item # for Requested Additional Information (April 20, 2016 CAB letter2)	Status	Preliminary Plan
1	Complete. No further action.	
2a	In progress	Provide dates and supporting process information identifying process unit shutdown periods. Provide utilization-related data supporting the determination that 2010 is not representative of normal source operation. Some or all of this information may be Confidential Business Information (CBI) and will be submitted per DOH's CBI protocol, provided to the refinery by email, June 9, 2016
2b	Complete. No further action.	
2c	Complete. No further action.	

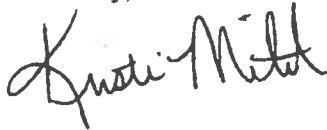
Manager, Clean Air Branch
June 30, 2016
Page 3

2d	In progress	Provide input process data and parameters used in the estimation of 2009 and 2010 GHG emissions, consistent with the GHG MRR reporting.
2e	Complete. No further action.	
2f	Complete. No further action.	

We believe the preliminary recommendation above is consistent with the discussions with your staff. Due to the extensive data collection, we may request additional time to complete collection of the information, as noted in your May 27, 2016 letter.

If you should have questions or require further information, please contact Kristi Mitchum at (808) 682-3145.

Sincerely,



Enclosures

Manager, Clean Air Branch
June 30, 2016
Page 3

bcc: Kristi Mitchum

Records File: A-3-0-0-16

Electronic File:

\\KAPHINTDATA\KAPHI.CHEVRONTEXACO.NET\SHARE\Envr\GHG\Emission Reduction
Plan\2016 DOH Request for Additional Information\Correspondence\Jun 30 2016 Preliminary Plan
for GHG Additional Information Request.docx

Sch 6/30/16
MA 6/30/16

Legal review: Susan Owen 6/30/16

Discussed early draft w/ KM. 6/29/16

Attachment IV
CD with Chevron Hawaii Refinery GHG Emissions

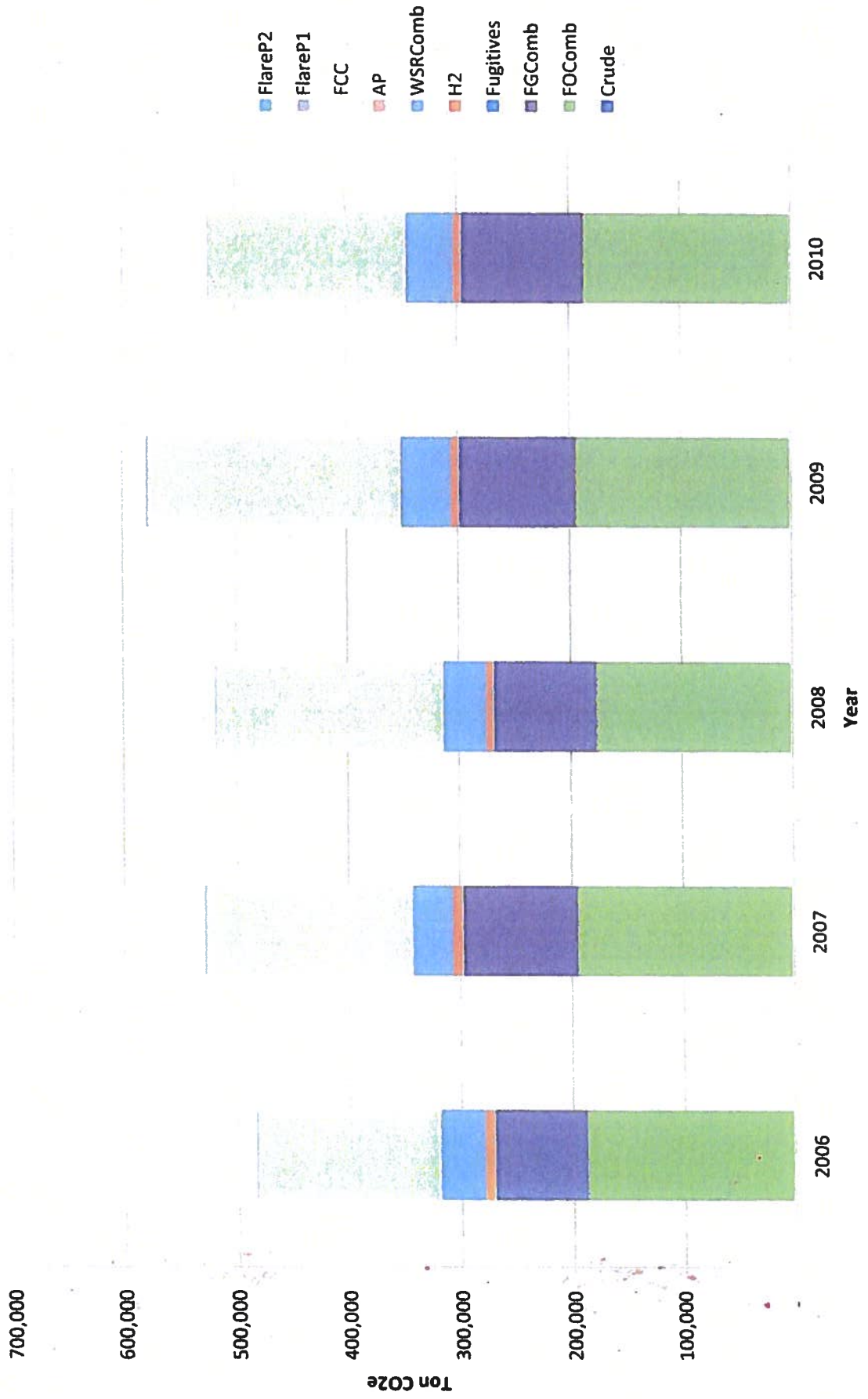
Attachment V
Chevron Hawaii Refinery GHG emissions

This is a sheet for calculating direct GHG emissions in the Hawaii Refinery.

Process Units	Tab
FCC Unit (Regenerator) (Plant 53)	FCC
Fuel Oil Combustion	FO Comb
Fuel Gas Combustion	FG Comb
WSR Combustion (Cogens)	WSR Comb
Flare P1 Sweet	Flare P1
Flare P2 Sour	Flare P2
Acid Plant (Unit 62)	AP
Crude Tank	Crude
Diesel Engine	Diesel Eng
Fugitives	Fugitives
Hydrogen Manufacturing (Unit 57)	H2 Manufac

Color Code
Description
Inputs
Intermediate Expressions
Final Expression (Emission Rate)
Not Used

Hawaii Refinery CO2e Emissions



Year	Crude	FCC	FO Comb	FG Comb	Fugitives	Flare P1	Flare P2	H2	AP	WSR Comb	TOTAL (ton CO2e)
2006	46	162,976	186,569	82,136	363	1,044	118	8,983	584	39,700	482,530
2007	46	184,301	193,906	102,017	363	1,053	93	9,354	577	35,745	527,454
2008	42	203,649	175,891	91,098	363	424	99	6,908	486	38,457	517,418
2009	45	226,349	193,346	103,990	363	1,017	117	7,247	485	44,986	577,945
2010	37	177,838	186,197	108,645	363		8	7,025	475	42,529	523,117

Demonstration Workbook Calculated Emissions Metric Tons CO2e/year				
Year	Fuel Combustion	FCC	Remaining Sources	Demonstration Total
2006	308,406	162,976	11,148	482,530
2007	331,667	184,301	11,486	527,454
2008	305,447	203,649	8,321	517,418
2009	342,322	226,349	9,274	577,945
2010	337,371	177,838	7,907	523,117

Actual Emissions	% Diff
536,124	10%
569,048	7%
522,593	1%
581,734	1%
529,651	1%

1% Difference in Averaging Periods, GWP and EF Changes
 1% Difference in Averaging Periods, GWP and EF Changes
 1% Difference in Averaging Periods, GWP and EF Changes

Notes on GHG emission calculations for historical years:

GWP potentials in Default Const tab are the current factors, effective 2014, for consistency with the MRR reporting.

Input data averaging periods are different from EPA's IVT methodology. Different averaging periods of data such as heating value can cause differences in calculation results.

Some emission factors have changed from the earlier years in this historical data set (e.g. FO combustion). This spreadsheet uses the current EFs for consistency with MRR reporting.

Some sources have been added to the historical years for consistency with the current MRR inventory (AP and Crude).

GHG emissions for internal combustion engines (ICE) have been added to the 2015 and later years inventory to account for newly permitted sources.

Attachment V
 GHG Calculations 2006-2010.xlsx
 Default Const

Type of Value	Parameter Name	Variable Name	Unit	Variable Value
Global Constant	F to R	STPConv	dimensionless	459.671
Global Constant	MolVolConvEPA, StdCond	StdMolVolEPA	scf/mol	0.8495
Global Constant	Operating Hours in a Month	OperatingHoursMonth	hr	732
Global Constant	kg to tonne	ConvTonneKg	dimensionless	0.001
Global Constant	mmbbl to bbl	Conv8bblMmbbl	dimensionless	1000000
Global Constant	tonne to lb	ConvLbTonne	dimensionless	2204.62
Global Constant	kg to lb	ConvLbKg	dimensionless	2.20462
Global Constant	bbl to gal	ConvGalBbl	dimensionless	42
Global Constant	mmbtu to mmbtu	ConvMmbtuMmbtu	dimensionless	0.001
Global Constant	mscf to scf	ConvScfMscf	dimensionless	1000
Global Constant	g to lb	ConvLbG	dimensionless	0.00220462
Global Constant	btu to mmbtu	ConvMmbtuBtu	dimensionless	0.000001
Global Constant	Minute to Hour	ConvHrMin	dimensionless	0.016666667
Global Constant	Operating Hours in a 30d Month	OperatingHoursMonth	hr	720
Global Constant	Operating Hours in a 31d Month	OperatingHoursMonth	hr	744
Global Constant	Operating Hours in a 28d Month	OperatingHoursMonth	hr	672
Global Constant	Operating Hours in a 29d Month	OperatingHoursMonth	hr	696
Global Constant	Methane GWP 2014 updated value	MGWP	dimensionless	25
Global Constant	Nitrous Oxide GWP 2014 updated value	NGWP	dimensionless	298
Global Constant	Methane GWP old value	oMGWP	dimensionless	21
Global Constant	Nitrous Oxide GWP old value	oNGWP	dimensionless	301

leap years: 2016; 2012; 2008; 2004; 2000

Entity - Proc Unit ID	Material Name	Type of Value	Parameter Name	Variable Name	Unit	Variable Value
Crude Tank	Methane	Global Emission Factor	Dflt Emis Factor, Storage Tanks, EPA Y	EF	tonne/1000000 bbl	0.1
Diesel Engine	Carbon Dioxide	Global Emission Factor	Comb, Distillate Fuel Oil No. 2, EPA	EF	kg/mmbtu	75.96
	Carbon Dioxide	Global Emission Factor	Default HHV, Distillate Fuel Oil No. 2, EPA	HHV	mmbtu/gal	0.138
	Methane	Global Emission Factor	Comb, Distillate Fuel Oil No. 2, EPA	EF	kg/mmbtu	0.003
	Methane	Global Emission Factor	Default HHV, Distillate Fuel Oil No. 2, EPA	HHV	mmbtu/gal	0.138
	Nitrogen Oxide (N2O)	Global Emission Factor	Comb, Distillate Fuel Oil No. 2, EPA	EF	kg/mmbtu	0.0006
FCC Unit (Regenerator) (Plant 53)	Nitrogen Oxide (N2O)	Global Emission Factor	Default HHV, Distillate Fuel Oil No. 2, EPA	HHV	mmbtu/gal	0.138
	Methane	Global Emission Factor	Comb, Petroleum Coke, EPA	EF_CO2	kg/mmbtu	102.41
	Methane	Global Emission Factor	Comb, Petroleum Products, EPA	EF_CH4	kg/mmbtu	0.003
	Nitrogen Oxide (N2O)	Global Emission Factor	Comb, Petroleum Coke, EPA	EF_CO2	kg/mmbtu	102.41
	Nitrogen Oxide (N2O)	Global Emission Factor	Comb, Petroleum Products, EPA	EF_N2O	kg/mmbtu	0.0006
Fuel Oil Combustion	Carbon Dioxide	Global Emission Factor	Comb, Distillate Fuel Oil No. 6, EPA	EF	kg/mmbtu	75.1
	Methane	Global Emission Factor	Comb, Distillate Fuel Oil No. 6, EPA	EF	kg/mmbtu	0.003
	Nitrogen Oxide (N2O)	Global Emission Factor	Comb, Distillate Fuel Oil No. 6, EPA	EF	kg/mmbtu	0.0006
Fugitives	Methane	Global Emission Factor, 2014, 2015	Comb, Natural Gas, Pipeline, EPA	EF	kg/mmbtu	0.001
	Nitrogen Oxide (N2O)	Global Emission Factor, 2014, 2015	Comb, Natural Gas, Pipeline, EPA	EF	kg/mmbtu	0.0001
Flare P1 Sweet	Methane	Global Emission Factor, 2013 and earlier	Comb, Fuel Gas, EPA	EF	kg/mmbtu	0.003
	Nitrogen Oxide (N2O)	Global Emission Factor, 2013 and earlier	Comb, Fuel Gas, EPA	EF	kg/mmbtu	0.0006
Flare P2 Sour	Carbon Dioxide	Global Emission Factor	Flr, Refinery Default, EPA	EF_CO2	kg/mmbtu	60
	Methane	Global Emission Factor	Comb, Petroleum Products, EPA	EF_CH4	kg/mmbtu	0.003
	Methane	Global Emission Factor	Flr, Refinery Default, EPA	EF_CO2	kg/mmbtu	60
	Nitrogen Oxide (N2O)	Global Emission Factor	Comb, Petroleum Products, EPA	EF_N2O	kg/mmbtu	0.0006
	Nitrogen Oxide (N2O)	Global Emission Factor	Flr, Refinery Default, EPA	EF_CO2	kg/mmbtu	60
	Methane	Global Emission Factor	Default weight fraction of carbon in methane in f_CH4	dimensionless		0.4
	Carbon Dioxide	Global Emission Factor	Flr, Refinery Default, EPA	EF_CO2	kg/mmbtu	60
	Methane	Global Emission Factor	Comb, Petroleum Products, EPA	EF_CH4	kg/mmbtu	0.003
	Methane	Global Emission Factor	Flr, Refinery Default, EPA	EF_CO2	kg/mmbtu	60
	Nitrogen Oxide (N2O)	Global Emission Factor	Comb, Petroleum Products, EPA	EF_N2O	kg/mmbtu	0.0006
Hydrogen Manufacturing (Unit 57)	Nitrogen Oxide (N2O)	Global Emission Factor	Flr, Refinery Default, EPA	EF_CO2	kg/mmbtu	60
	Methane	Global Emission Factor	Default weight fraction of carbon in methane in f_CH4	dimensionless		0.4
Acid Plant (Unit 62)	Carbon Dioxide	Global Emission Factor	Comb, Naptha (<401 deg F), EPA	EF	kg/mmbtu	68.02
	Methane	Global Emission Factor	Comb, Naptha (<401 deg F), EPA	EF	kg/mmbtu	0.003
	Nitrogen Oxide (N2O)	Global Emission Factor	Comb, Naptha (<401 deg F), EPA	EF	kg/mmbtu	0.0006

Attachment V
GHG Calculations 2006-2010.xlsx
Crude

Month	Year	Process Unit	Emission Scenario	GHG Species	Crude Received	Units	Species Emission Rate Expression	Species Emission Rate	Units	Converted Rate	Units	MT/Month CO ₂ e	Comments
Jan	2010	Crude Receiving Tanks	Venting	Methane	1492000	bbi	CrudeReceived * EF / ConvBblMmbbl * ConvLbTonne	328.929304	lb/month	0.1492	lb/month	3.73	
Feb	2010	Crude Receiving Tanks	Venting	Methane	440079	bbi	CrudeReceived * EF / ConvBblMmbbl * ConvLbTonne	97.0206965	lb/month	0.0440079	lb/month	1.1001975	
Mar	2010	Crude Receiving Tanks	Venting	Methane	430569	bbi	CrudeReceived * EF / ConvBblMmbbl * ConvLbTonne	94.92410288	lb/month	0.0430569	lb/month	1.0764225	
Apr	2010	Crude Receiving Tanks	Venting	Methane	1050333	bbi	CrudeReceived * EF / ConvBblMmbbl * ConvLbTonne	231.5585138	lb/month	0.1050333	lb/month	2.6258325	
May	2010	Crude Receiving Tanks	Venting	Methane	1731924	bbi	CrudeReceived * EF / ConvBblMmbbl * ConvLbTonne	381.8234289	lb/month	0.1731924	lb/month	4.32981	
Jun	2010	Crude Receiving Tanks	Venting	Methane	1491503	bbi	CrudeReceived * EF / ConvBblMmbbl * ConvLbTonne	328.8197344	lb/month	0.1491503	lb/month	3.7287575	
Jul	2010	Crude Receiving Tanks	Venting	Methane	1386339	bbi	CrudeReceived * EF / ConvBblMmbbl * ConvLbTonne	305.6350686	lb/month	0.1386339	lb/month	3.4658475	
Aug	2010	Crude Receiving Tanks	Venting	Methane	1323702	bbi	CrudeReceived * EF / ConvBblMmbbl * ConvLbTonne	291.8259903	lb/month	0.1323702	lb/month	3.309255	
Sep	2010	Crude Receiving Tanks	Venting	Methane	1320190	bbi	CrudeReceived * EF / ConvBblMmbbl * ConvLbTonne	291.0517278	lb/month	0.132019	lb/month	3.300475	
Oct	2010	Crude Receiving Tanks	Venting	Methane	1762869	bbi	CrudeReceived * EF / ConvBblMmbbl * ConvLbTonne	388.6456255	lb/month	0.1762869	lb/month	4.4071725	
Nov	2010	Crude Receiving Tanks	Venting	Methane	1310805	bbi	CrudeReceived * EF / ConvBblMmbbl * ConvLbTonne	288.9826919	lb/month	0.1310805	lb/month	3.2770125	
Dec	2010	Crude Receiving Tanks	Venting	Methane	1104842	bbi	CrudeReceived * EF / ConvBblMmbbl * ConvLbTonne	243.573677	lb/month	0.1104842	lb/month	2.762105	
Jan	2009	Crude Receiving Tanks	Venting	Methane	1559299	bbi	CrudeReceived * EF / ConvBblMmbbl * ConvLbTonne	343.7661761	lb/month	0.1559299	lb/month	3.8982475	
Feb	2009	Crude Receiving Tanks	Venting	Methane	1427805	bbi	CrudeReceived * EF / ConvBblMmbbl * ConvLbTonne	314.7767459	lb/month	0.1427805	lb/month	3.5695125	
Mar	2009	Crude Receiving Tanks	Venting	Methane	1594532	bbi	CrudeReceived * EF / ConvBblMmbbl * ConvLbTonne	351.5337138	lb/month	0.1594532	lb/month	3.98633	
Apr	2009	Crude Receiving Tanks	Venting	Methane	1506419	bbi	CrudeReceived * EF / ConvBblMmbbl * ConvLbTonne	332.1081456	lb/month	0.1506419	lb/month	3.7660475	
May	2009	Crude Receiving Tanks	Venting	Methane	1623472.49	bbi	CrudeReceived * EF / ConvBblMmbbl * ConvLbTonne	357.9139921	lb/month	0.162347249	lb/month	4.058681225	
Jun	2009	Crude Receiving Tanks	Venting	Methane	1331272	bbi	CrudeReceived * EF / ConvBblMmbbl * ConvLbTonne	293.4948877	lb/month	0.1331272	lb/month	3.32818	
Jul	2009	Crude Receiving Tanks	Venting	Methane	1529534	bbi	CrudeReceived * EF / ConvBblMmbbl * ConvLbTonne	337.2041247	lb/month	0.1529534	lb/month	3.823835	
Aug	2009	Crude Receiving Tanks	Venting	Methane	1506679	bbi	CrudeReceived * EF / ConvBblMmbbl * ConvLbTonne	332.1654657	lb/month	0.1506679	lb/month	3.7666975	
Sep	2009	Crude Receiving Tanks	Venting	Methane	1436862	bbi	CrudeReceived * EF / ConvBblMmbbl * ConvLbTonne	316.7734702	lb/month	0.1436862	lb/month	3.592155	
Oct	2009	Crude Receiving Tanks	Venting	Methane	1490289	bbi	CrudeReceived * EF / ConvBblMmbbl * ConvLbTonne	328.5520935	lb/month	0.1490289	lb/month	3.7257225	
Nov	2009	Crude Receiving Tanks	Venting	Methane	1406602	bbi	CrudeReceived * EF / ConvBblMmbbl * ConvLbTonne	310.1022901	lb/month	0.1406602	lb/month	3.516505	
Dec	2009	Crude Receiving Tanks	Venting	Methane	1472692.53	bbi	CrudeReceived * EF / ConvBblMmbbl * ConvLbTonne	324.6727405	lb/month	0.147269253	lb/month	3.681731325	
Jan	2008	Crude Receiving Tanks	Venting	Methane	1,397,466	bbi	CrudeReceived * EF / ConvBblMmbbl * ConvLbTonne	308.0881493	lb/month	0.1397466	lb/month	3.493665	
Feb	2008	Crude Receiving Tanks	Venting	Methane	1,384,529	bbi	CrudeReceived * EF / ConvBblMmbbl * ConvLbTonne	305.2360324	lb/month	0.1384529	lb/month	3.4613225	
Mar	2008	Crude Receiving Tanks	Venting	Methane	1,486,376	bbi	CrudeReceived * EF / ConvBblMmbbl * ConvLbTonne	327.6894257	lb/month	0.1486376	lb/month	3.71594	

Attachment V
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Crude

Apr	2008	Crude Receiving Tanks	Venting	Methane	269,218	bbl	CrudeReceived * EF / ConvBblMmbbl *	ConvLbTonne	59,352,33872	lb/month	0.0269218	MT/month	0.673045
May	2008	Crude Receiving Tanks	Venting	Methane	1,291,791	bbl	CrudeReceived * EF / ConvBblMmbbl *	ConvLbTonne	284,790,8274	lb/month	0.1291791	MT/month	3.2294775
Jun	2008	Crude Receiving Tanks	Venting	Methane	1,623,674	bbl	CrudeReceived * EF / ConvBblMmbbl *	ConvLbTonne	357,958,4174	lb/month	0.1623674	MT/month	4.059185
Jul	2008	Crude Receiving Tanks	Venting	Methane	1,627,361	bbl	CrudeReceived * EF / ConvBblMmbbl *	ConvLbTonne	358,771,2608	lb/month	0.1627361	MT/month	4.0684025
Aug	2008	Crude Receiving Tanks	Venting	Methane	1,611,706	bbl	CrudeReceived * EF / ConvBblMmbbl *	ConvLbTonne	355,319,9282	lb/month	0.1611706	MT/month	4.029265
Sep	2008	Crude Receiving Tanks	Venting	Methane	1,550,789	bbl	CrudeReceived * EF / ConvBblMmbbl *	ConvLbTonne	341,890,0445	lb/month	0.1550789	MT/month	3.8769725
Oct	2008	Crude Receiving Tanks	Venting	Methane	1,557,031	bbl	CrudeReceived * EF / ConvBblMmbbl *	ConvLbTonne	343,266,1683	lb/month	0.1557031	MT/month	3.8925775
Nov	2008	Crude Receiving Tanks	Venting	Methane	1,509,513	bbl	CrudeReceived * EF / ConvBblMmbbl *	ConvLbTonne	332,790,3101	lb/month	0.150951325	MT/month	3.773783125
Dec	2008	Crude Receiving Tanks	Venting	Methane	1,356,291	bbl	CrudeReceived * EF / ConvBblMmbbl *	ConvLbTonne	299,010,6284	lb/month	0.1356291	MT/month	3.3907275
Jan	2007	Crude Receiving Tanks	Venting	Methane	1,466,545	bbl	CrudeReceived * EF / ConvBblMmbbl *	ConvLbTonne	323,317,4438	lb/month	0.1466545	MT/month	3.6663625
Feb	2007	Crude Receiving Tanks	Venting	Methane	1,339,636	bbl	CrudeReceived * EF / ConvBblMmbbl *	ConvLbTonne	295,338,8318	lb/month	0.1339636	MT/month	3.34909
Mar	2007	Crude Receiving Tanks	Venting	Methane	1,693,629	bbl	CrudeReceived * EF / ConvBblMmbbl *	ConvLbTonne	373,380,8366	lb/month	0.1693629	MT/month	4.2340725
Apr	2007	Crude Receiving Tanks	Venting	Methane	1,578,161	bbl	CrudeReceived * EF / ConvBblMmbbl *	ConvLbTonne	347,924,5304	lb/month	0.1578161	MT/month	3.9454025
May	2007	Crude Receiving Tanks	Venting	Methane	1,600,416	bbl	CrudeReceived * EF / ConvBblMmbbl *	ConvLbTonne	352,830,9122	lb/month	0.1600416	MT/month	4.00104
Jun	2007	Crude Receiving Tanks	Venting	Methane	1,527,688	bbl	CrudeReceived * EF / ConvBblMmbbl *	ConvLbTonne	336,797,1519	lb/month	0.1527688	MT/month	3.81922
Jul	2007	Crude Receiving Tanks	Venting	Methane	1,602,345	bbl	CrudeReceived * EF / ConvBblMmbbl *	ConvLbTonne	353,256,1834	lb/month	0.1602345	MT/month	4.0058625
Aug	2007	Crude Receiving Tanks	Venting	Methane	1,618,201	bbl	CrudeReceived * EF / ConvBblMmbbl *	ConvLbTonne	356,751,8289	lb/month	0.1618201	MT/month	4.0455025
Sep	2007	Crude Receiving Tanks	Venting	Methane	1,509,742	bbl	CrudeReceived * EF / ConvBblMmbbl *	ConvLbTonne	332,840,7408	lb/month	0.1509742	MT/month	3.774355
Oct	2007	Crude Receiving Tanks	Venting	Methane	1,558,936	bbl	CrudeReceived * EF / ConvBblMmbbl *	ConvLbTonne	343,686,1484	lb/month	0.1558936	MT/month	3.89734
Nov	2007	Crude Receiving Tanks	Venting	Methane	1,522,028	bbl	CrudeReceived * EF / ConvBblMmbbl *	ConvLbTonne	335,549,3369	lb/month	0.1522028	MT/month	3.80507
Dec	2007	Crude Receiving Tanks	Venting	Methane	1,487,195	bbl	CrudeReceived * EF / ConvBblMmbbl *	ConvLbTonne	327,869,9841	lb/month	0.1487195	MT/month	3.7179875
Jan	2006	Crude Receiving Tanks	Venting	Methane	1,591,074	bbl	CrudeReceived * EF / ConvBblMmbbl *	ConvLbTonne	350,771,3562	lb/month	0.1591074	MT/month	3.977685
Feb	2006	Crude Receiving Tanks	Venting	Methane	1,303,237	bbl	CrudeReceived * EF / ConvBblMmbbl *	ConvLbTonne	287,314,2355	lb/month	0.1303237	MT/month	3.2580925
Mar	2006	Crude Receiving Tanks	Venting	Methane	1,615,911	bbl	CrudeReceived * EF / ConvBblMmbbl *	ConvLbTonne	356,246,9709	lb/month	0.1615911	MT/month	4.0397775
Apr	2006	Crude Receiving Tanks	Venting	Methane	1,616,167	bbl	CrudeReceived * EF / ConvBblMmbbl *	ConvLbTonne	356,303,4092	lb/month	0.1616167	MT/month	4.0404175
May	2006	Crude Receiving Tanks	Venting	Methane	1,647,866	bbl	CrudeReceived * EF / ConvBblMmbbl *	ConvLbTonne	363,291,8341	lb/month	0.1647866	MT/month	4.119665
Jun	2006	Crude Receiving Tanks	Venting	Methane	1,614,604	bbl	CrudeReceived * EF / ConvBblMmbbl *	ConvLbTonne	355,958,827	lb/month	0.1614604	MT/month	4.03651
Jul	2006	Crude Receiving Tanks	Venting	Methane	1,549,070	bbl	CrudeReceived * EF / ConvBblMmbbl *	ConvLbTonne	341,511,0703	lb/month	0.154907	MT/month	3.872675
Aug	2006	Crude Receiving Tanks	Venting	Methane	1,620,232	bbl	CrudeReceived * EF / ConvBblMmbbl *	ConvLbTonne	357,199,5872	lb/month	0.1620232	MT/month	4.05058
Sep	2006	Crude Receiving Tanks	Venting	Methane	1,514,354	bbl	CrudeReceived * EF / ConvBblMmbbl *	ConvLbTonne	333,857,5115	lb/month	0.1514354	MT/month	3.785885

Attachment V
 GHG Calculations 2006-2010.xlsx

		Crude										
Oct	2006	Crude Receiving Tanks	Venting	Methane	1052789	bbbl	CrudeReceived * EF / ConvBblMmbbl *	232.09996685	lb/month	0.1052789	MT/month	2.6319725
	Nov	Crude Receiving Tanks	Venting	Methane	1574147	bbbl	CrudeReceived * EF / ConvBblMmbbl *	347.0395959	lb/month	0.1574147	MT/month	3.9353675
	Dec	Crude Receiving Tanks	Venting	Methane	1660198	bbbl	CrudeReceived * EF / ConvBblMmbbl *	366.0105715	lb/month	0.1660198	MT/month	4.150495

Month	Year	Process Unit	Emission Scenario	GHG Species	Incl. Air Flow Rate (FlowRateAir)	Units	Enriched O ₂ Flow Rate (FlowRateO2Enrich)	Units	Species Emission Rate Expression	Species Emission Rate	Units	Converted Rate	Units	MT/Month CO ₂ e	Comments
Jan	2007	FCC Unit-Plant 53	Coke Combustion	Carbon Dioxide	10952880	lbs	0.93	lb C/lb coke	CokeBurned * CarbonContent * 44/12	3749320.6	lb/month	16841.39789	MT/month	16841.39789	
Jan	2007	FCC Unit-Plant 53	Coke Combustion	Methane	10952880	lbs	0.93	lb C/lb coke	CokeBurned * CarbonContent * 44/12 * EF_CO2	1094.11436	lb/month	0.498281235	MT/month	12.40703	
Jan	2007	FCC Unit-Plant 53	Coke Combustion	Nitrogen Oxide	10952880	lbs	0.93	lb C/lb coke	CokeBurned * CarbonContent * 44/12 * EF_N2O	216.6223072	lb/month	0.098256247	MT/month	28.57636	
Feb	2007	FCC Unit-Plant 53	Coke Combustion	Carbon Dioxide	7325280	lbs	0.93	lb C/lb coke	CokeBurned * CarbonContent * 44/12	24979204.8	lb/month	11330.39018	MT/month	11330.39018	
Feb	2007	FCC Unit-Plant 53	Coke Combustion	Methane	7325280	lbs	0.93	lb C/lb coke	CokeBurned * CarbonContent * 44/12 * EF_CO2	7317411815	lb/month	0.331912611	MT/month	8.29782	
Feb	2007	FCC Unit-Plant 53	Coke Combustion	Nitrogen Oxide	7325280	lbs	0.93	lb C/lb coke	CokeBurned * CarbonContent * 44/12 * EF_N2O	146.3462363	lb/month	0.063825222	MT/month	19.78189	
Mar	2007	FCC Unit-Plant 53	Coke Combustion	Carbon Dioxide	9062880	lbs	0.93	lb C/lb coke	CokeBurned * CarbonContent * 44/12	30694420.8	lb/month	14018.02615	MT/month	14018.02615	
Mar	2007	FCC Unit-Plant 53	Coke Combustion	Methane	9062880	lbs	0.93	lb C/lb coke	CokeBurned * CarbonContent * 44/12 * EF_CO2	9053145435	lb/month	0.410644258	MT/month	10.26611	
Mar	2007	FCC Unit-Plant 53	Coke Combustion	Nitrogen Oxide	9062880	lbs	0.93	lb C/lb coke	CokeBurned * CarbonContent * 44/12 * EF_N2O	181.0629087	lb/month	0.082128652	MT/month	24.47440	
Apr	2007	FCC Unit-Plant 53	Coke Combustion	Carbon Dioxide	10183680	lbs	0.93	lb C/lb coke	CokeBurned * CarbonContent * 44/12	34726346.8	lb/month	15751.62559	MT/month	15751.62559	
Apr	2007	FCC Unit-Plant 53	Coke Combustion	Methane	10183680	lbs	0.93	lb C/lb coke	CokeBurned * CarbonContent * 44/12 * EF_CO2	1017274157	lb/month	0.451428344	MT/month	11.53571	
Apr	2007	FCC Unit-Plant 53	Coke Combustion	Nitrogen Oxide	10183680	lbs	0.93	lb C/lb coke	CokeBurned * CarbonContent * 44/12 * EF_N2O	203.4548314	lb/month	0.082285669	MT/month	27.50113	
May	2007	FCC Unit-Plant 53	Coke Combustion	Carbon Dioxide	9509280	lbs	0.93	lb C/lb coke	CokeBurned * CarbonContent * 44/12	32426844.8	lb/month	14708.48616	MT/month	14708.48616	
May	2007	FCC Unit-Plant 53	Coke Combustion	Methane	9509280	lbs	0.93	lb C/lb coke	CokeBurned * CarbonContent * 44/12 * EF_CO2	948.9065951	lb/month	0.430870886	MT/month	10.77177	
May	2007	FCC Unit-Plant 53	Coke Combustion	Nitrogen Oxide	9509280	lbs	0.93	lb C/lb coke	CokeBurned * CarbonContent * 44/12 * EF_N2O	189.881319	lb/month	0.086174179	MT/month	25.67981	
Jun	2007	FCC Unit-Plant 53	Coke Combustion	Carbon Dioxide	9282000	lbs	0.93	lb C/lb coke	CokeBurned * CarbonContent * 44/12	31651820	lb/month	14356.9504	MT/month	14356.9504	
Jun	2007	FCC Unit-Plant 53	Coke Combustion	Methane	9282000	lbs	0.93	lb C/lb coke	CokeBurned * CarbonContent * 44/12 * EF_CO2	9272030075	lb/month	0.42057271	MT/month	10.51432	
Jun	2007	FCC Unit-Plant 53	Coke Combustion	Nitrogen Oxide	9282000	lbs	0.93	lb C/lb coke	CokeBurned * CarbonContent * 44/12 * EF_N2O	185.4406815	lb/month	0.084114542	MT/month	25.06613	
Jul	2007	FCC Unit-Plant 53	Coke Combustion	Carbon Dioxide	11227680	lbs	0.93	lb C/lb coke	CokeBurned * CarbonContent * 44/12	38286386.8	lb/month	17386.43449	MT/month	17386.43449	
Jul	2007	FCC Unit-Plant 53	Coke Combustion	Methane	11227680	lbs	0.93	lb C/lb coke	CokeBurned * CarbonContent * 44/12 * EF_CO2	1121.562019	lb/month	0.508732579	MT/month	12.71831	
Jul	2007	FCC Unit-Plant 53	Coke Combustion	Nitrogen Oxide	11227680	lbs	0.93	lb C/lb coke	CokeBurned * CarbonContent * 44/12 * EF_N2O	224.3124039	lb/month	0.101746518	MT/month	30.32046	
Aug	2007	FCC Unit-Plant 53	Coke Combustion	Carbon Dioxide	10929840	lbs	0.93	lb C/lb coke	CokeBurned * CarbonContent * 44/12	3727054.4	lb/month	16905.74993	MT/month	16905.74993	
Aug	2007	FCC Unit-Plant 53	Coke Combustion	Methane	10929840	lbs	0.93	lb C/lb coke	CokeBurned * CarbonContent * 44/12 * EF_CO2	1091.610011	lb/month	0.485237279	MT/month	12.38093	
Aug	2007	FCC Unit-Plant 53	Coke Combustion	Nitrogen Oxide	10929840	lbs	0.93	lb C/lb coke	CokeBurned * CarbonContent * 44/12 * EF_N2O	218.3620021	lb/month	0.098047456	MT/month	29.51614	
Sep	2007	FCC Unit-Plant 53	Coke Combustion	Carbon Dioxide	10804640	lbs	0.93	lb C/lb coke	CokeBurned * CarbonContent * 44/12	38161822.4	lb/month	16402.74623	MT/month	16402.74623	
Sep	2007	FCC Unit-Plant 53	Coke Combustion	Methane	10804640	lbs	0.93	lb C/lb coke	CokeBurned * CarbonContent * 44/12 * EF_CO2	1059.324841	lb/month	0.480502282	MT/month	12.01256	
Sep	2007	FCC Unit-Plant 53	Coke Combustion	Nitrogen Oxide	10804640	lbs	0.93	lb C/lb coke	CokeBurned * CarbonContent * 44/12 * EF_N2O	211.8648882	lb/month	0.098100456	MT/month	28.63784	
Oct	2007	FCC Unit-Plant 53	Coke Combustion	Carbon Dioxide	10814720	lbs	0.93	lb C/lb coke	CokeBurned * CarbonContent * 44/12	38198185.2	lb/month	16418.33749	MT/month	16418.33749	
Oct	2007	FCC Unit-Plant 53	Coke Combustion	Methane	10814720	lbs	0.93	lb C/lb coke	CokeBurned * CarbonContent * 44/12 * EF_CO2	1080.331658	lb/month	0.480856013	MT/month	12.02389	
Oct	2007	FCC Unit-Plant 53	Coke Combustion	Nitrogen Oxide	10814720	lbs	0.93	lb C/lb coke	CokeBurned * CarbonContent * 44/12 * EF_N2O	212.0683716	lb/month	0.088191603	MT/month	28.66516	
Nov	2007	FCC Unit-Plant 53	Coke Combustion	Carbon Dioxide	9746880	lbs	0.93	lb C/lb coke	CokeBurned * CarbonContent * 44/12	33236860.8	lb/month	15076.00439	MT/month	15076.00439	
Nov	2007	FCC Unit-Plant 53	Coke Combustion	Methane	9746880	lbs	0.93	lb C/lb coke	CokeBurned * CarbonContent * 44/12 * EF_CO2	973.6410741	lb/month	0.441636688	MT/month	11.04092	
Nov	2007	FCC Unit-Plant 53	Coke Combustion	Nitrogen Oxide	9746880	lbs	0.93	lb C/lb coke	CokeBurned * CarbonContent * 44/12 * EF_N2O	184.7282148	lb/month	0.088327338	MT/month	26.32155	
Dec	2007	FCC Unit-Plant 53	Coke Combustion	Carbon Dioxide	8418280	lbs	0.93	lb C/lb coke	CokeBurned * CarbonContent * 44/12	32119744.8	lb/month	14569.28849	MT/month	14569.28849	
Dec	2007	FCC Unit-Plant 53	Coke Combustion	Methane	8418280	lbs	0.93	lb C/lb coke	CokeBurned * CarbonContent * 44/12 * EF_CO2	840.9162621	lb/month	0.428792945	MT/month	10.86982	
Dec	2007	FCC Unit-Plant 53	Coke Combustion	Nitrogen Oxide	8418280	lbs	0.93	lb C/lb coke	CokeBurned * CarbonContent * 44/12 * EF_N2O	188.1832524	lb/month	0.085356589	MT/month	25.43886	
Jan	2008	FCC Unit-Plant 53	Coke Combustion	Carbon Dioxide	9310731.846	lbs	0.93	lb C/lb coke	CokeBurned * CarbonContent * 44/12	31748955.6	lb/month	14401.39144	MT/month	14401.39144	
Jan	2008	FCC Unit-Plant 53	Coke Combustion	Methane	9310731.846	lbs	0.93	lb C/lb coke	CokeBurned * CarbonContent * 44/12 * EF_CO2	930.073109	lb/month	0.421874566	MT/month	10.54686	
Jan	2008	FCC Unit-Plant 53	Coke Combustion	Nitrogen Oxide	9310731.846	lbs	0.93	lb C/lb coke	CokeBurned * CarbonContent * 44/12 * EF_N2O	188.0146212	lb/month	0.084374813	MT/month	25.14372	
Feb	2008	FCC Unit-Plant 53	Coke Combustion	Carbon Dioxide	8365910.358	lbs	0.93	lb C/lb coke	CokeBurned * CarbonContent * 44/12	2170754.32	lb/month	9846.48344	MT/month	9846.48344	
Feb	2008	FCC Unit-Plant 53	Coke Combustion	Methane	8365910.358	lbs	0.93	lb C/lb coke	CokeBurned * CarbonContent * 44/12 * EF_CO2	835.9072646	lb/month	0.28843026	MT/month	7.21108	
Feb	2008	FCC Unit-Plant 53	Coke Combustion	Nitrogen Oxide	8365910.358	lbs	0.93	lb C/lb coke	CokeBurned * CarbonContent * 44/12 * EF_N2O	127.1814529	lb/month	0.057688605	MT/month	17.18120	
Mar	2008	FCC Unit-Plant 53	Coke Combustion	Carbon Dioxide	3503832.394	lbs	0.93	lb C/lb coke	CokeBurned * CarbonContent * 44/12	1184886.46	lb/month	5419.559137	MT/month	5419.55914	
Mar	2008	FCC Unit-Plant 53	Coke Combustion	Methane	3503832.394	lbs	0.93	lb C/lb coke	CokeBurned * CarbonContent * 44/12 * EF_CO2	350.0688769	lb/month	0.158780643	MT/month	3.86902	

Mar	2006	FCC Unit-Plant 53	Coke Combustion	Nitrogen Oxide	3503832.394	0.93	lb C/lb coke	CokeBurned * CarbonContent * 44/12 * EF_N2O / EF_CO2	70 00137759	lb/month	0.031752129	MT/month	9.46213
Apr	2006	FCC Unit-Plant 53	Coke Combustion	Carbon Dioxide	6164240.557	0.93	lb C/lb coke	CokeBurned * CarbonContent * 44/12	27840000.3	lb/month	12628.65395	MT/month	12628.65395
Apr	2006	FCC Unit-Plant 53	Coke Combustion	Methane	8164240.557	0.93	lb C/lb coke	CokeBurned * CarbonContent * 44/12 * EF_CH4 / EF_CO2	815 5471233	lb/month	0.369626392	MT/month	9.24816
Apr	2006	FCC Unit-Plant 53	Coke Combustion	Nitrogen Oxide	8164240.557	0.93	lb C/lb coke	CokeBurned * CarbonContent * 44/12 * EF_N2O / EF_CO2	183 1094247	lb/month	0.073965278	MT/month	22.04761
May	2006	FCC Unit-Plant 53	Coke Combustion	Carbon Dioxide	6952108.813	0.93	lb C/lb coke	CokeBurned * CarbonContent * 44/12	30526691.05	lb/month	13946.69061	MT/month	13946.69061
May	2006	FCC Unit-Plant 53	Coke Combustion	Methane	6952108.813	0.93	lb C/lb coke	CokeBurned * CarbonContent * 44/12 * EF_CH4 / EF_CO2	864 2483229	lb/month	0.405625152	MT/month	10.14063
May	2006	FCC Unit-Plant 53	Coke Combustion	Nitrogen Oxide	6952108.813	0.93	lb C/lb coke	CokeBurned * CarbonContent * 44/12 * EF_N2O / EF_CO2	178 8498646	lb/month	0.08112503	MT/month	24.17526
Jun	2006	FCC Unit-Plant 53	Coke Combustion	Carbon Dioxide	6919019.898	0.93	lb C/lb coke	CokeBurned * CarbonContent * 44/12	30413857.85	lb/month	13785.51027	MT/month	13785.51027
Jun	2006	FCC Unit-Plant 53	Coke Combustion	Methane	6919019.898	0.93	lb C/lb coke	CokeBurned * CarbonContent * 44/12 * EF_CH4 / EF_CO2	635 8072646	lb/month	0.288443028	MT/month	7.21108
Jun	2006	FCC Unit-Plant 53	Coke Combustion	Nitrogen Oxide	6919019.898	0.93	lb C/lb coke	CokeBurned * CarbonContent * 44/12 * EF_N2O / EF_CO2	70 00137759	lb/month	0.031752129	MT/month	9.46213
Jul	2006	FCC Unit-Plant 53	Coke Combustion	Carbon Dioxide	10185566.28	0.93	lb C/lb coke	CokeBurned * CarbonContent * 44/12	27840000.3	lb/month	12628.65395	MT/month	12628.65395
Jul	2006	FCC Unit-Plant 53	Coke Combustion	Methane	10185566.28	0.93	lb C/lb coke	CokeBurned * CarbonContent * 44/12 * EF_CH4 / EF_CO2	1017 76228	lb/month	0.481848745	MT/month	11.54124
Jul	2006	FCC Unit-Plant 53	Coke Combustion	Nitrogen Oxide	10185566.28	0.93	lb C/lb coke	CokeBurned * CarbonContent * 44/12 * EF_N2O / EF_CO2	203 552452	lb/month	0.092329949	MT/month	27.51432
Aug	2006	FCC Unit-Plant 53	Coke Combustion	Carbon Dioxide	9804348.838	0.93	lb C/lb coke	CokeBurned * CarbonContent * 44/12	32750022.71	lb/month	14855.54098	MT/month	14855.54098
Aug	2006	FCC Unit-Plant 53	Coke Combustion	Methane	9804348.838	0.93	lb C/lb coke	CokeBurned * CarbonContent * 44/12 * EF_CH4 / EF_CO2	959 4030674	lb/month	0.435178429	MT/month	10.87946
Aug	2006	FCC Unit-Plant 53	Coke Combustion	Nitrogen Oxide	9804348.838	0.93	lb C/lb coke	CokeBurned * CarbonContent * 44/12 * EF_N2O / EF_CO2	191 8606135	lb/month	0.087035686	MT/month	25.89683
Sep	2006	FCC Unit-Plant 53	Coke Combustion	Carbon Dioxide	11170007.68	0.93	lb C/lb coke	CokeBurned * CarbonContent * 44/12	38089726.19	lb/month	17277.22972	MT/month	17277.22972
Sep	2006	FCC Unit-Plant 53	Coke Combustion	Methane	11170007.68	0.93	lb C/lb coke	CokeBurned * CarbonContent * 44/12 * EF_CH4 / EF_CO2	1115 800982	lb/month	0.506119414	MT/month	12.65289
Sep	2006	FCC Unit-Plant 53	Coke Combustion	Nitrogen Oxide	11170007.68	0.93	lb C/lb coke	CokeBurned * CarbonContent * 44/12 * EF_N2O / EF_CO2	223 1601984	lb/month	0.101223883	MT/month	30.16472
Oct	2006	FCC Unit-Plant 53	Coke Combustion	Carbon Dioxide	7983865.613	0.93	lb C/lb coke	CokeBurned * CarbonContent * 44/12	27158781.74	lb/month	12318.12384	MT/month	12318.12384
Oct	2006	FCC Unit-Plant 53	Coke Combustion	Methane	7983865.613	0.93	lb C/lb coke	CokeBurned * CarbonContent * 44/12 * EF_CH4 / EF_CO2	795 5311514	lb/month	0.36084729	MT/month	9.02118
Oct	2006	FCC Unit-Plant 53	Coke Combustion	Nitrogen Oxide	7983865.613	0.93	lb C/lb coke	CokeBurned * CarbonContent * 44/12 * EF_N2O / EF_CO2	159 1062303	lb/month	0.072169456	MT/month	21.50650
Nov	2006	FCC Unit-Plant 53	Coke Combustion	Carbon Dioxide	11240984.94	0.93	lb C/lb coke	CokeBurned * CarbonContent * 44/12	38337356.85	lb/month	17387.01393	MT/month	17387.01393
Nov	2006	FCC Unit-Plant 53	Coke Combustion	Methane	11240984.94	0.93	lb C/lb coke	CokeBurned * CarbonContent * 44/12 * EF_CH4 / EF_CO2	1122 891084	lb/month	0.505335434	MT/month	12.73339
Nov	2006	FCC Unit-Plant 53	Coke Combustion	Nitrogen Oxide	11240984.94	0.93	lb C/lb coke	CokeBurned * CarbonContent * 44/12 * EF_N2O / EF_CO2	224 5782169	lb/month	0.101867087	MT/month	30.35839
Dec	2006	FCC Unit-Plant 53	Coke Combustion	Carbon Dioxide	11753015.55	0.93	lb C/lb coke	CokeBurned * CarbonContent * 44/12	40077783.03	lb/month	18178.99921	MT/month	18178.99921
Dec	2006	FCC Unit-Plant 53	Coke Combustion	Methane	11753015.55	0.93	lb C/lb coke	CokeBurned * CarbonContent * 44/12 * EF_CH4 / EF_CO2	1174 039148	lb/month	0.532535833	MT/month	13.31340
Dec	2006	FCC Unit-Plant 53	Coke Combustion	Nitrogen Oxide	11753015.55	0.93	lb C/lb coke	CokeBurned * CarbonContent * 44/12 * EF_N2O / EF_CO2	234 8078295	lb/month	0.106507167	MT/month	31.73914

Attachment V
GHG Calculations 2006-2010.xlsx
FO Comb

Month	Year	Process Unit	Emission Scenario	GHG Species	Fuel Use (Liquid Volume) [FuelUsage]	Units	Heat Content (Liquid) - HHV	Units	Species Emission Rate Calculation	Emission Rate	Units	Converted Rate	Units	MT/Month CO ₂ e	Comments
Jan	2010	Fuel Oil Combustion Sources	Stationary Comb	Carbon Dioxide	31340	bbbl	6327	bbbl	FuelUsage*HHV*EF*ConvLkg*ConvMmbuMbu	32829971.56	lb/month	14891.44232	MT/month	14891.44232	
Jan	2010	Fuel Oil Combustion Sources	Stationary Comb	Methane	31340	bbbl	6327	bbbl	FuelUsage*HHV*EF*ConvLkg*ConvMmbuMbu	1311.450282	lb/month	0.59486454	MT/month	14.8716135	
Jan	2010	Fuel Oil Combustion Sources	Stationary Comb	Nitrogen Oxide	31340	bbbl	6327	bbbl	FuelUsage*HHV*EF*ConvLkg*ConvMmbuMbu	262.2600524	lb/month	0.118972908	MT/month	35.45392658	
Feb	2010	Fuel Oil Combustion Sources	Stationary Comb	Carbon Dioxide	33918	bbbl	6331	bbbl	FuelUsage*HHV*EF*ConvLkg*ConvMmbuMbu	35552998.07	lb/month	16126.58784	MT/month	16126.58784	
Feb	2010	Fuel Oil Combustion Sources	Stationary Comb	Methane	33918	bbbl	6331	bbbl	FuelUsage*HHV*EF*ConvLkg*ConvMmbuMbu	1420.228288	lb/month	0.644204574	MT/month	16.0511435	
Feb	2010	Fuel Oil Combustion Sources	Stationary Comb	Nitrogen Oxide	33918	bbbl	6331	bbbl	FuelUsage*HHV*EF*ConvLkg*ConvMmbuMbu	284.0425276	lb/month	0.128840915	MT/month	38.39459261	
Mar	2010	Fuel Oil Combustion Sources	Stationary Comb	Carbon Dioxide	33340	bbbl	6318	bbbl	FuelUsage*HHV*EF*ConvLkg*ConvMmbuMbu	34876375.88	lb/month	15819.22321	MT/month	15819.22321	
Mar	2010	Fuel Oil Combustion Sources	Stationary Comb	Methane	33340	bbbl	6318	bbbl	FuelUsage*HHV*EF*ConvLkg*ConvMmbuMbu	1393.157492	lb/month	0.63192836	MT/month	15.788159	
Mar	2010	Fuel Oil Combustion Sources	Stationary Comb	Nitrogen Oxide	33340	bbbl	6318	bbbl	FuelUsage*HHV*EF*ConvLkg*ConvMmbuMbu	278.6314984	lb/month	0.126385272	MT/month	37.86281106	
Apr	2010	Fuel Oil Combustion Sources	Stationary Comb	Carbon Dioxide	30460	bbbl	6345	bbbl	FuelUsage*HHV*EF*ConvLkg*ConvMmbuMbu	31998911.51	lb/month	14514.47937	MT/month	14514.47937	
Apr	2010	Fuel Oil Combustion Sources	Stationary Comb	Methane	30460	bbbl	6345	bbbl	FuelUsage*HHV*EF*ConvLkg*ConvMmbuMbu	1278.252124	lb/month	0.5798061	MT/month	14.4951525	
Apr	2010	Fuel Oil Combustion Sources	Stationary Comb	Nitrogen Oxide	30460	bbbl	6345	bbbl	FuelUsage*HHV*EF*ConvLkg*ConvMmbuMbu	255.6504248	lb/month	0.11598122	MT/month	34.5644356	
May	2010	Fuel Oil Combustion Sources	Stationary Comb	Carbon Dioxide	31282	bbbl	6351	bbbl	FuelUsage*HHV*EF*ConvLkg*ConvMmbuMbu	32893516.49	lb/month	14920.26585	MT/month	14920.26585	
May	2010	Fuel Oil Combustion Sources	Stationary Comb	Methane	31282	bbbl	6351	bbbl	FuelUsage*HHV*EF*ConvLkg*ConvMmbuMbu	1313.988675	lb/month	0.596015946	MT/month	14.90039865	
May	2010	Fuel Oil Combustion Sources	Stationary Comb	Nitrogen Oxide	31282	bbbl	6351	bbbl	FuelUsage*HHV*EF*ConvLkg*ConvMmbuMbu	262.797735	lb/month	0.119203189	MT/month	35.52255038	
Jun	2010	Fuel Oil Combustion Sources	Stationary Comb	Carbon Dioxide	33876	bbbl	6320	bbbl	FuelUsage*HHV*EF*ConvLkg*ConvMmbuMbu	35442777.28	lb/month	16078.63363	MT/month	16078.63363	
Jun	2010	Fuel Oil Combustion Sources	Stationary Comb	Methane	33876	bbbl	6320	bbbl	FuelUsage*HHV*EF*ConvLkg*ConvMmbuMbu	1415.003087	lb/month	0.64226898	MT/month	18.057224	
Jun	2010	Fuel Oil Combustion Sources	Stationary Comb	Nitrogen Oxide	33876	bbbl	6320	bbbl	FuelUsage*HHV*EF*ConvLkg*ConvMmbuMbu	283.2008174	lb/month	0.128457792	MT/month	38.28042202	
Jul	2010	Fuel Oil Combustion Sources	Stationary Comb	Carbon Dioxide	32359	bbbl	6309	bbbl	FuelUsage*HHV*EF*ConvLkg*ConvMmbuMbu	33800980.57	lb/month	15331.88512	MT/month	15331.88512	
Jul	2010	Fuel Oil Combustion Sources	Stationary Comb	Methane	32359	bbbl	6309	bbbl	FuelUsage*HHV*EF*ConvLkg*ConvMmbuMbu	1350.238904	lb/month	0.612485793	MT/month	15.31146983	
Jul	2010	Fuel Oil Combustion Sources	Stationary Comb	Nitrogen Oxide	32359	bbbl	6309	bbbl	FuelUsage*HHV*EF*ConvLkg*ConvMmbuMbu	270.0477808	lb/month	0.122481759	MT/month	36.50254406	
Aug	2010	Fuel Oil Combustion Sources	Stationary Comb	Carbon Dioxide	34262	bbbl	6373	bbbl	FuelUsage*HHV*EF*ConvLkg*ConvMmbuMbu	38151831.92	lb/month	16398.21462	MT/month	16398.21462	
Aug	2010	Fuel Oil Combustion Sources	Stationary Comb	Methane	34262	bbbl	6373	bbbl	FuelUsage*HHV*EF*ConvLkg*ConvMmbuMbu	1444.147747	lb/month	0.655055178	MT/month	16.37637945	
Aug	2010	Fuel Oil Combustion Sources	Stationary Comb	Nitrogen Oxide	34262	bbbl	6373	bbbl	FuelUsage*HHV*EF*ConvLkg*ConvMmbuMbu	288.8295493	lb/month	0.13101038	MT/month	39.04128861	
Sep	2010	Fuel Oil Combustion Sources	Stationary Comb	Carbon Dioxide	29624	bbbl	6331	bbbl	FuelUsage*HHV*EF*ConvLkg*ConvMmbuMbu	31052008.22	lb/month	14084.97075	MT/month	14084.97075	
Sep	2010	Fuel Oil Combustion Sources	Stationary Comb	Methane	29624	bbbl	6331	bbbl	FuelUsage*HHV*EF*ConvLkg*ConvMmbuMbu	1240.426427	lb/month	0.626248532	MT/month	14.0662156	
Sep	2010	Fuel Oil Combustion Sources	Stationary Comb	Nitrogen Oxide	29624	bbbl	6331	bbbl	FuelUsage*HHV*EF*ConvLkg*ConvMmbuMbu	248.0852854	lb/month	0.112529726	MT/month	33.53385647	
Oct	2010	Fuel Oil Combustion Sources	Stationary Comb	Carbon Dioxide	33425	bbbl	6363	bbbl	FuelUsage*HHV*EF*ConvLkg*ConvMmbuMbu	35213323.71	lb/month	15972.51395	MT/month	15972.51395	
Oct	2010	Fuel Oil Combustion Sources	Stationary Comb	Methane	33425	bbbl	6363	bbbl	FuelUsage*HHV*EF*ConvLkg*ConvMmbuMbu	1408.657405	lb/month	0.638049825	MT/month	15.95124563	
Oct	2010	Fuel Oil Combustion Sources	Stationary Comb	Nitrogen Oxide	33425	bbbl	6363	bbbl	FuelUsage*HHV*EF*ConvLkg*ConvMmbuMbu	281.331481	lb/month	0.127609965	MT/month	38.02769597	
Nov	2010	Fuel Oil Combustion Sources	Stationary Comb	Carbon Dioxide	32314	bbbl	6359	bbbl	FuelUsage*HHV*EF*ConvLkg*ConvMmbuMbu	34021481.82	lb/month	15431.90292	MT/month	15431.90292	
Nov	2010	Fuel Oil Combustion Sources	Stationary Comb	Methane	32314	bbbl	6359	bbbl	FuelUsage*HHV*EF*ConvLkg*ConvMmbuMbu	1359.04721	lb/month	0.618454178	MT/month	15.41135445	
Nov	2010	Fuel Oil Combustion Sources	Stationary Comb	Nitrogen Oxide	32314	bbbl	6359	bbbl	FuelUsage*HHV*EF*ConvLkg*ConvMmbuMbu	271.809442	lb/month	0.123290338	MT/month	36.74066901	
Dec	2010	Fuel Oil Combustion Sources	Stationary Comb	Carbon Dioxide	33567	bbbl	6347	bbbl	FuelUsage*HHV*EF*ConvLkg*ConvMmbuMbu	3527999.7	lb/month	16000.03615	MT/month	16000.03615	
Dec	2010	Fuel Oil Combustion Sources	Stationary Comb	Methane	33567	bbbl	6347	bbbl	FuelUsage*HHV*EF*ConvLkg*ConvMmbuMbu	1409.081213	lb/month	0.639149247	MT/month	15.97873118	

Dec	2010	Fuel Oil Combustion Sources	Stationary Comb	Nitrogen Oxide	33567	bbt	6347	mtbu/bbl	FuelUsage*HV*EF*ConvLkg*ConvMmbtu/bbl	0.127629149	lb/month	MT/month	38.09329512
Jan	2009	Fuel Oil Combustion Sources	Stationary Comb	Carbon Dioxide	36719	bbt	6314	mtbu/bbl	FuelUsage*HV*EF*ConvLkg*ConvMmbtu/bbl	17411.46683	lb/month	MT/month	17411.46683
Jan	2009	Fuel Oil Combustion Sources	Stationary Comb	Methane	36719	bbt	6314	mtbu/bbl	FuelUsage*HV*EF*ConvLkg*ConvMmbtu/bbl	0.695531288	lb/month	MT/month	17.38828245
Jan	2009	Fuel Oil Combustion Sources	Stationary Comb	Nitrogen Oxide	36719	bbt	6314	mtbu/bbl	FuelUsage*HV*EF*ConvLkg*ConvMmbtu/bbl	0.13910628	lb/month	MT/month	41.45366536
Feb	2009	Fuel Oil Combustion Sources	Stationary Comb	Carbon Dioxide	33395	bbt	6287	mtbu/bbl	FuelUsage*HV*EF*ConvLkg*ConvMmbtu/bbl	15767.57281	lb/month	MT/month	15767.57281
Feb	2009	Fuel Oil Combustion Sources	Stationary Comb	Methane	33395	bbt	6287	mtbu/bbl	FuelUsage*HV*EF*ConvLkg*ConvMmbtu/bbl	0.629865095	lb/month	MT/month	15.74857738
Feb	2009	Fuel Oil Combustion Sources	Stationary Comb	Nitrogen Oxide	33395	bbt	6287	mtbu/bbl	FuelUsage*HV*EF*ConvLkg*ConvMmbtu/bbl	0.125972619	lb/month	MT/month	37.53940046
Mar	2009	Fuel Oil Combustion Sources	Stationary Comb	Carbon Dioxide	37900	bbt	6328	mtbu/bbl	FuelUsage*HV*EF*ConvLkg*ConvMmbtu/bbl	18011.32312	lb/month	MT/month	18011.32312
Mar	2009	Fuel Oil Combustion Sources	Stationary Comb	Methane	37900	bbt	6328	mtbu/bbl	FuelUsage*HV*EF*ConvLkg*ConvMmbtu/bbl	0.7194936	lb/month	MT/month	17.98734
Mar	2009	Fuel Oil Combustion Sources	Stationary Comb	Nitrogen Oxide	37900	bbt	6328	mtbu/bbl	FuelUsage*HV*EF*ConvLkg*ConvMmbtu/bbl	0.14369072	lb/month	MT/month	42.88181656
Apr	2009	Fuel Oil Combustion Sources	Stationary Comb	Carbon Dioxide	33723	bbt	6292	mtbu/bbl	FuelUsage*HV*EF*ConvLkg*ConvMmbtu/bbl	15935.10221	lb/month	MT/month	15935.10221
Apr	2009	Fuel Oil Combustion Sources	Stationary Comb	Methane	33723	bbt	6292	mtbu/bbl	FuelUsage*HV*EF*ConvLkg*ConvMmbtu/bbl	0.636555348	lb/month	MT/month	15.9136837
Apr	2009	Fuel Oil Combustion Sources	Stationary Comb	Nitrogen Oxide	33723	bbt	6292	mtbu/bbl	FuelUsage*HV*EF*ConvLkg*ConvMmbtu/bbl	0.12731107	lb/month	MT/month	37.93669874
May	2009	Fuel Oil Combustion Sources	Stationary Comb	Carbon Dioxide	35290	bbt	6324	mtbu/bbl	FuelUsage*HV*EF*ConvLkg*ConvMmbtu/bbl	16760.3644	lb/month	MT/month	16760.3644
May	2009	Fuel Oil Combustion Sources	Stationary Comb	Methane	35290	bbt	6324	mtbu/bbl	FuelUsage*HV*EF*ConvLkg*ConvMmbtu/bbl	0.66952188	lb/month	MT/month	16.730047
May	2009	Fuel Oil Combustion Sources	Stationary Comb	Nitrogen Oxide	35290	bbt	6324	mtbu/bbl	FuelUsage*HV*EF*ConvLkg*ConvMmbtu/bbl	0.133904376	lb/month	MT/month	39.90500405
Jun	2009	Fuel Oil Combustion Sources	Stationary Comb	Carbon Dioxide	31427	bbt	6303	mtbu/bbl	FuelUsage*HV*EF*ConvLkg*ConvMmbtu/bbl	14876.13701	lb/month	MT/month	14876.13701
Jun	2009	Fuel Oil Combustion Sources	Stationary Comb	Methane	31427	bbt	6303	mtbu/bbl	FuelUsage*HV*EF*ConvLkg*ConvMmbtu/bbl	0.594253143	lb/month	MT/month	14.85632858
Jun	2009	Fuel Oil Combustion Sources	Stationary Comb	Nitrogen Oxide	31427	bbt	6303	mtbu/bbl	FuelUsage*HV*EF*ConvLkg*ConvMmbtu/bbl	0.118850629	lb/month	MT/month	35.41748732
Jul	2009	Fuel Oil Combustion Sources	Stationary Comb	Carbon Dioxide	35350	bbt	6308	mtbu/bbl	FuelUsage*HV*EF*ConvLkg*ConvMmbtu/bbl	16748.38378	lb/month	MT/month	16748.38378
Jul	2009	Fuel Oil Combustion Sources	Stationary Comb	Methane	35350	bbt	6308	mtbu/bbl	FuelUsage*HV*EF*ConvLkg*ConvMmbtu/bbl	0.66989634	lb/month	MT/month	16.724085
Jul	2009	Fuel Oil Combustion Sources	Stationary Comb	Nitrogen Oxide	35350	bbt	6308	mtbu/bbl	FuelUsage*HV*EF*ConvLkg*ConvMmbtu/bbl	0.13379268	lb/month	MT/month	39.87021864
Aug	2009	Fuel Oil Combustion Sources	Stationary Comb	Carbon Dioxide	33960	bbt	6345	mtbu/bbl	FuelUsage*HV*EF*ConvLkg*ConvMmbtu/bbl	16182.26262	lb/month	MT/month	16182.26262
Aug	2009	Fuel Oil Combustion Sources	Stationary Comb	Methane	33960	bbt	6345	mtbu/bbl	FuelUsage*HV*EF*ConvLkg*ConvMmbtu/bbl	0.6464286	lb/month	MT/month	16.160715
Aug	2009	Fuel Oil Combustion Sources	Stationary Comb	Nitrogen Oxide	33960	bbt	6345	mtbu/bbl	FuelUsage*HV*EF*ConvLkg*ConvMmbtu/bbl	0.12928572	lb/month	MT/month	38.52714456
Sep	2009	Fuel Oil Combustion Sources	Stationary Comb	Carbon Dioxide	34521	bbt	6313	mtbu/bbl	FuelUsage*HV*EF*ConvLkg*ConvMmbtu/bbl	16366.62358	lb/month	MT/month	16366.62358
Sep	2009	Fuel Oil Combustion Sources	Stationary Comb	Methane	34521	bbt	6313	mtbu/bbl	FuelUsage*HV*EF*ConvLkg*ConvMmbtu/bbl	0.653793219	lb/month	MT/month	16.34483048
Sep	2009	Fuel Oil Combustion Sources	Stationary Comb	Nitrogen Oxide	34521	bbt	6313	mtbu/bbl	FuelUsage*HV*EF*ConvLkg*ConvMmbtu/bbl	0.130758644	lb/month	MT/month	38.96807585
Oct	2009	Fuel Oil Combustion Sources	Stationary Comb	Carbon Dioxide	36044	bbt	6299	mtbu/bbl	FuelUsage*HV*EF*ConvLkg*ConvMmbtu/bbl	17996.90062	lb/month	MT/month	17996.90062
Oct	2009	Fuel Oil Combustion Sources	Stationary Comb	Methane	36044	bbt	6299	mtbu/bbl	FuelUsage*HV*EF*ConvLkg*ConvMmbtu/bbl	0.718917468	lb/month	MT/month	17.979367
Oct	2009	Fuel Oil Combustion Sources	Stationary Comb	Nitrogen Oxide	36044	bbt	6299	mtbu/bbl	FuelUsage*HV*EF*ConvLkg*ConvMmbtu/bbl	0.143783494	lb/month	MT/month	42.84748109
Nov	2009	Fuel Oil Combustion Sources	Stationary Comb	Carbon Dioxide	27119	bbt	6342	mtbu/bbl	FuelUsage*HV*EF*ConvLkg*ConvMmbtu/bbl	12916.35122	lb/month	MT/month	12916.35122
Nov	2009	Fuel Oil Combustion Sources	Stationary Comb	Methane	27119	bbt	6342	mtbu/bbl	FuelUsage*HV*EF*ConvLkg*ConvMmbtu/bbl	0.515966094	lb/month	MT/month	12.89915235
Nov	2009	Fuel Oil Combustion Sources	Stationary Comb	Nitrogen Oxide	27119	bbt	6342	mtbu/bbl	FuelUsage*HV*EF*ConvLkg*ConvMmbtu/bbl	0.103193219	lb/month	MT/month	30.7515792
Dec	2009	Fuel Oil Combustion Sources	Stationary Comb	Carbon Dioxide	28856	bbt	6333	mtbu/bbl	FuelUsage*HV*EF*ConvLkg*ConvMmbtu/bbl	13724.1531	lb/month	MT/month	13724.1531
Dec	2009	Fuel Oil Combustion Sources	Stationary Comb	Methane	28856	bbt	6333	mtbu/bbl	FuelUsage*HV*EF*ConvLkg*ConvMmbtu/bbl	0.548235144	lb/month	MT/month	13.7058786
Dec	2009	Fuel Oil Combustion Sources	Stationary Comb	Nitrogen Oxide	28856	bbt	6333	mtbu/bbl	FuelUsage*HV*EF*ConvLkg*ConvMmbtu/bbl	0.109647029	lb/month	MT/month	32.87481458

Jan	2008	Fuel Oil Combustion Sources	Stationary Comb	Carbon Dioxide	34582	bb	6312	mbu/bbl	FuelUsage*HHV*EF - ConvLkg * ConvMmbu/bbl	36140218.72	lb/month	16392.94696	MT/month	16392.94696
Jan	2008	Fuel Oil Combustion Sources	Stationary Comb	Methane	34582	bb	6312	mbu/bbl	FuelUsage*HHV*EF - ConvLkg * ConvMmbu/bbl	1443.683837	lb/month	0.654844752	MT/month	16.3711188
Jan	2008	Fuel Oil Combustion Sources	Stationary Comb	Nitrogen Oxide	34582	bb	6312	mbu/bbl	FuelUsage*HHV*EF - ConvLkg * ConvMmbu/bbl	288.7367674	lb/month	0.13096895	MT/month	39.02874722
Feb	2008	Fuel Oil Combustion Sources	Stationary Comb	Carbon Dioxide	32201	bb	6312	mbu/bbl	FuelUsage*HHV*EF - ConvLkg * ConvMmbu/bbl	33651934.04	lb/month	15264.27867	MT/month	15264.27867
Feb	2008	Fuel Oil Combustion Sources	Stationary Comb	Methane	32201	bb	6312	mbu/bbl	FuelUsage*HHV*EF - ConvLkg * ConvMmbu/bbl	1344.284982	lb/month	0.609758136	MT/month	15.2439534
Feb	2008	Fuel Oil Combustion Sources	Stationary Comb	Nitrogen Oxide	32201	bb	6312	mbu/bbl	FuelUsage*HHV*EF - ConvLkg * ConvMmbu/bbl	288.8589864	lb/month	0.121951627	MT/month	36.34158491
Mar	2008	Fuel Oil Combustion Sources	Stationary Comb	Carbon Dioxide	32628	bb	6312	mbu/bbl	FuelUsage*HHV*EF - ConvLkg * ConvMmbu/bbl	34098174.09	lb/month	15466.68999	MT/month	15466.68999
Mar	2008	Fuel Oil Combustion Sources	Stationary Comb	Methane	32628	bb	6312	mbu/bbl	FuelUsage*HHV*EF - ConvLkg * ConvMmbu/bbl	1362.110816	lb/month	0.617843808	MT/month	15.4460952
Mar	2008	Fuel Oil Combustion Sources	Stationary Comb	Nitrogen Oxide	32628	bb	6312	mbu/bbl	FuelUsage*HHV*EF - ConvLkg * ConvMmbu/bbl	272.4221632	lb/month	0.123568762	MT/month	36.82348096
Apr	2008	Fuel Oil Combustion Sources	Stationary Comb	Carbon Dioxide	8430	bb	6312	mbu/bbl	FuelUsage*HHV*EF - ConvLkg * ConvMmbu/bbl	8809844.539	lb/month	3996.083016	MT/month	3996.083016
Apr	2008	Fuel Oil Combustion Sources	Stationary Comb	Methane	8430	bb	6312	mbu/bbl	FuelUsage*HHV*EF - ConvLkg * ConvMmbu/bbl	351.9245488	lb/month	0.15963048	MT/month	3.990762
Apr	2008	Fuel Oil Combustion Sources	Stationary Comb	Nitrogen Oxide	8430	bb	6312	mbu/bbl	FuelUsage*HHV*EF - ConvLkg * ConvMmbu/bbl	70.38490976	lb/month	0.031926096	MT/month	9.513976608
May	2008	Fuel Oil Combustion Sources	Stationary Comb	Carbon Dioxide	28750	bb	6312	mbu/bbl	FuelUsage*HHV*EF - ConvLkg * ConvMmbu/bbl	30045438.59	lb/month	13628.397	MT/month	13628.397
May	2008	Fuel Oil Combustion Sources	Stationary Comb	Methane	28750	bb	6312	mbu/bbl	FuelUsage*HHV*EF - ConvLkg * ConvMmbu/bbl	1200.217174	lb/month	0.54441	MT/month	13.61025
May	2008	Fuel Oil Combustion Sources	Stationary Comb	Nitrogen Oxide	28750	bb	6312	mbu/bbl	FuelUsage*HHV*EF - ConvLkg * ConvMmbu/bbl	240.0434348	lb/month	0.109882	MT/month	32.446936
Jun	2008	Fuel Oil Combustion Sources	Stationary Comb	Carbon Dioxide	33223	bb	6312	mbu/bbl	FuelUsage*HHV*EF - ConvLkg * ConvMmbu/bbl	34719984	lb/month	15748.73856	MT/month	15748.73856
Jun	2008	Fuel Oil Combustion Sources	Stationary Comb	Methane	33223	bb	6312	mbu/bbl	FuelUsage*HHV*EF - ConvLkg * ConvMmbu/bbl	1386.950093	lb/month	0.629110728	MT/month	15.727682
Jun	2008	Fuel Oil Combustion Sources	Stationary Comb	Nitrogen Oxide	33223	bb	6312	mbu/bbl	FuelUsage*HHV*EF - ConvLkg * ConvMmbu/bbl	277.3900186	lb/month	0.125822146	MT/month	37.49499939
Jul	2008	Fuel Oil Combustion Sources	Stationary Comb	Carbon Dioxide	34999	bb	6312	mbu/bbl	FuelUsage*HHV*EF - ConvLkg * ConvMmbu/bbl	38576008.19	lb/month	16590.61797	MT/month	16590.61797
Jul	2008	Fuel Oil Combustion Sources	Stationary Comb	Methane	34999	bb	6312	mbu/bbl	FuelUsage*HHV*EF - ConvLkg * ConvMmbu/bbl	1481.092205	lb/month	0.662741064	MT/month	16.5685266
Jul	2008	Fuel Oil Combustion Sources	Stationary Comb	Nitrogen Oxide	34999	bb	6312	mbu/bbl	FuelUsage*HHV*EF - ConvLkg * ConvMmbu/bbl	252.2184409	lb/month	0.132548213	MT/month	39.49936741
Aug	2008	Fuel Oil Combustion Sources	Stationary Comb	Carbon Dioxide	32891	bb	6312	mbu/bbl	FuelUsage*HHV*EF - ConvLkg * ConvMmbu/bbl	34373024.52	lb/month	15591.3602	MT/month	15591.3602
Aug	2008	Fuel Oil Combustion Sources	Stationary Comb	Methane	32891	bb	6312	mbu/bbl	FuelUsage*HHV*EF - ConvLkg * ConvMmbu/bbl	1375.090194	lb/month	0.622823976	MT/month	15.5705994
Aug	2008	Fuel Oil Combustion Sources	Stationary Comb	Nitrogen Oxide	32891	bb	6312	mbu/bbl	FuelUsage*HHV*EF - ConvLkg * ConvMmbu/bbl	274.6180388	lb/month	0.124564795	MT/month	37.12030897
Sep	2008	Fuel Oil Combustion Sources	Stationary Comb	Carbon Dioxide	33745	bb	6312	mbu/bbl	FuelUsage*HHV*EF - ConvLkg * ConvMmbu/bbl	35265504.62	lb/month	15996.18284	MT/month	15996.18284
Sep	2008	Fuel Oil Combustion Sources	Stationary Comb	Methane	33745	bb	6312	mbu/bbl	FuelUsage*HHV*EF - ConvLkg * ConvMmbu/bbl	1408.741662	lb/month	0.638899532	MT/month	15.974883
Sep	2008	Fuel Oil Combustion Sources	Stationary Comb	Nitrogen Oxide	33745	bb	6312	mbu/bbl	FuelUsage*HHV*EF - ConvLkg * ConvMmbu/bbl	281.7483725	lb/month	0.127799064	MT/month	38.08412107
Oct	2008	Fuel Oil Combustion Sources	Stationary Comb	Carbon Dioxide	33550	bb	6312	mbu/bbl	FuelUsage*HHV*EF - ConvLkg * ConvMmbu/bbl	35061718.18	lb/month	15903.74676	MT/month	15903.74676
Oct	2008	Fuel Oil Combustion Sources	Stationary Comb	Methane	33550	bb	6312	mbu/bbl	FuelUsage*HHV*EF - ConvLkg * ConvMmbu/bbl	1400.601259	lb/month	0.6353028	MT/month	15.88257
Oct	2008	Fuel Oil Combustion Sources	Stationary Comb	Nitrogen Oxide	33550	bb	6312	mbu/bbl	FuelUsage*HHV*EF - ConvLkg * ConvMmbu/bbl	280.1202518	lb/month	0.12706056	MT/month	37.86404688
Nov	2008	Fuel Oil Combustion Sources	Stationary Comb	Carbon Dioxide	31964	bb	6312	mbu/bbl	FuelUsage*HHV*EF - ConvLkg * ConvMmbu/bbl	3344255.14	lb/month	15151.93328	MT/month	15151.93328
Nov	2008	Fuel Oil Combustion Sources	Stationary Comb	Methane	31964	bb	6312	mbu/bbl	FuelUsage*HHV*EF - ConvLkg * ConvMmbu/bbl	1334.391018	lb/month	0.605270304	MT/month	15.1317576
Nov	2008	Fuel Oil Combustion Sources	Stationary Comb	Nitrogen Oxide	31964	bb	6312	mbu/bbl	FuelUsage*HHV*EF - ConvLkg * ConvMmbu/bbl	266.8792035	lb/month	0.121054061	MT/month	36.07411012
Dec	2008	Fuel Oil Combustion Sources	Stationary Comb	Carbon Dioxide	32841	bb	6312	mbu/bbl	FuelUsage*HHV*EF - ConvLkg * ConvMmbu/bbl	34320771.59	lb/month	15567.65864	MT/month	15567.65864
Dec	2008	Fuel Oil Combustion Sources	Stationary Comb	Methane	32841	bb	6312	mbu/bbl	FuelUsage*HHV*EF - ConvLkg * ConvMmbu/bbl	1371.00286	lb/month	0.621877176	MT/month	15.5489284
Dec	2008	Fuel Oil Combustion Sources	Stationary Comb	Nitrogen Oxide	32841	bb	6312	mbu/bbl	FuelUsage*HHV*EF - ConvLkg * ConvMmbu/bbl	274.200572	lb/month	0.124375435	MT/month	37.06387969
Jan	2007	Fuel Oil Combustion Sources	Stationary Comb	Carbon Dioxide	31360	bb	6312	mbu/bbl	FuelUsage*HHV*EF - ConvLkg * ConvMmbu/bbl	32773039.71	lb/month	14885.61843	MT/month	14885.61843

Jan	2007	Fuel Oil Combustion Sources	Stationary Comb	Methane	31360	bbi	6312	mbu/bbl	FuelUsage*HHV*EF*ConvLkg*ConvMmbu/bbl	1308.17602	lb/month	0.59393296	MT/month	14.845824
Jan	2007	Fuel Oil Combustion Sources	Stationary Comb	Nitrogen Oxide	31360	bbi	6312	mbu/bbl	FuelUsage*HHV*EF*ConvLkg*ConvMmbu/bbl	261.8352041	lb/month	0.118766592	MT/month	35.39244442
Feb	2007	Fuel Oil Combustion Sources	Stationary Comb	Carbon Dioxide	28116	bbi	6312	mbu/bbl	FuelUsage*HHV*EF*ConvLkg*ConvMmbu/bbl	283.9286954	lb/month	13327.86122	MT/month	13327.86122
Feb	2007	Fuel Oil Combustion Sources	Stationary Comb	Methane	28116	bbi	6312	mbu/bbl	FuelUsage*HHV*EF*ConvLkg*ConvMmbu/bbl	1173.749776	lb/month	0.532404576	MT/month	13.3101144
Feb	2007	Fuel Oil Combustion Sources	Stationary Comb	Nitrogen Oxide	28116	bbi	6312	mbu/bbl	FuelUsage*HHV*EF*ConvLkg*ConvMmbu/bbl	234.7499553	lb/month	0.106480915	MT/month	31.73131273
Mar	2007	Fuel Oil Combustion Sources	Stationary Comb	Carbon Dioxide	36763	bbi	6312	mbu/bbl	FuelUsage*HHV*EF*ConvLkg*ConvMmbu/bbl	384.1949167	lb/month	17426.80901	MT/month	17426.80901
Mar	2007	Fuel Oil Combustion Sources	Stationary Comb	Methane	36763	bbi	6312	mbu/bbl	FuelUsage*HHV*EF*ConvLkg*ConvMmbu/bbl	1534.733356	lb/month	0.696144168	MT/month	17.4036042
Mar	2007	Fuel Oil Combustion Sources	Stationary Comb	Nitrogen Oxide	36763	bbi	6312	mbu/bbl	FuelUsage*HHV*EF*ConvLkg*ConvMmbu/bbl	306.9466711	lb/month	0.139228334	MT/month	41.49019241
Apr	2007	Fuel Oil Combustion Sources	Stationary Comb	Carbon Dioxide	34034	bbi	6312	mbu/bbl	FuelUsage*HHV*EF*ConvLkg*ConvMmbu/bbl	35567626.58	lb/month	16133.17766	MT/month	16133.17766
Apr	2007	Fuel Oil Combustion Sources	Stationary Comb	Methane	34034	bbi	6312	mbu/bbl	FuelUsage*HHV*EF*ConvLkg*ConvMmbu/bbl	1420.806654	lb/month	0.644467824	MT/month	16.1116956
Apr	2007	Fuel Oil Combustion Sources	Stationary Comb	Nitrogen Oxide	34034	bbi	6312	mbu/bbl	FuelUsage*HHV*EF*ConvLkg*ConvMmbu/bbl	284.1613308	lb/month	0.128893565	MT/month	38.41028231
May	2007	Fuel Oil Combustion Sources	Stationary Comb	Carbon Dioxide	38036	bbi	6312	mbu/bbl	FuelUsage*HHV*EF*ConvLkg*ConvMmbu/bbl	38749851.35	lb/month	18030.25072	MT/month	18030.25072
May	2007	Fuel Oil Combustion Sources	Stationary Comb	Methane	38036	bbi	6312	mbu/bbl	FuelUsage*HHV*EF*ConvLkg*ConvMmbu/bbl	1587.876885	lb/month	0.720248686	MT/month	18.0062424
May	2007	Fuel Oil Combustion Sources	Stationary Comb	Nitrogen Oxide	38036	bbi	6312	mbu/bbl	FuelUsage*HHV*EF*ConvLkg*ConvMmbu/bbl	317.575377	lb/month	0.144049939	MT/month	42.92868188
Jun	2007	Fuel Oil Combustion Sources	Stationary Comb	Carbon Dioxide	38318	bbi	6312	mbu/bbl	FuelUsage*HHV*EF*ConvLkg*ConvMmbu/bbl	40044557.89	lb/month	18163.92752	MT/month	18163.92752
Jun	2007	Fuel Oil Combustion Sources	Stationary Comb	Methane	38318	bbi	6312	mbu/bbl	FuelUsage*HHV*EF*ConvLkg*ConvMmbu/bbl	1599.64945	lb/month	0.725388648	MT/month	18.1397412
Jun	2007	Fuel Oil Combustion Sources	Stationary Comb	Nitrogen Oxide	38318	bbi	6312	mbu/bbl	FuelUsage*HHV*EF*ConvLkg*ConvMmbu/bbl	319.92989	lb/month	0.14511793	MT/month	43.24514302
Jul	2007	Fuel Oil Combustion Sources	Stationary Comb	Carbon Dioxide	34045	bbi	6312	mbu/bbl	FuelUsage*HHV*EF*ConvLkg*ConvMmbu/bbl	35579022.22	lb/month	16138.3922	MT/month	16138.3922
Jul	2007	Fuel Oil Combustion Sources	Stationary Comb	Methane	34045	bbi	6312	mbu/bbl	FuelUsage*HHV*EF*ConvLkg*ConvMmbu/bbl	1421.265868	lb/month	0.64467612	MT/month	16.116903
Jul	2007	Fuel Oil Combustion Sources	Stationary Comb	Nitrogen Oxide	34045	bbi	6312	mbu/bbl	FuelUsage*HHV*EF*ConvLkg*ConvMmbu/bbl	284.2531735	lb/month	0.128935224	MT/month	38.42268675
Aug	2007	Fuel Oil Combustion Sources	Stationary Comb	Carbon Dioxide	34395	bbi	6312	mbu/bbl	FuelUsage*HHV*EF*ConvLkg*ConvMmbu/bbl	35944792.75	lb/month	16304.30312	MT/month	16304.30312
Aug	2007	Fuel Oil Combustion Sources	Stationary Comb	Methane	34395	bbi	6312	mbu/bbl	FuelUsage*HHV*EF*ConvLkg*ConvMmbu/bbl	1435.877207	lb/month	0.65130372	MT/month	16.282593
Aug	2007	Fuel Oil Combustion Sources	Stationary Comb	Nitrogen Oxide	34395	bbi	6312	mbu/bbl	FuelUsage*HHV*EF*ConvLkg*ConvMmbu/bbl	287.1754414	lb/month	0.130260744	MT/month	38.81770171
Sep	2007	Fuel Oil Combustion Sources	Stationary Comb	Carbon Dioxide	31273	bbi	6312	mbu/bbl	FuelUsage*HHV*EF*ConvLkg*ConvMmbu/bbl	32682119.6	lb/month	14824.37772	MT/month	14824.37772
Sep	2007	Fuel Oil Combustion Sources	Stationary Comb	Methane	31273	bbi	6312	mbu/bbl	FuelUsage*HHV*EF*ConvLkg*ConvMmbu/bbl	1305.544059	lb/month	0.592185528	MT/month	14.8046382
Sep	2007	Fuel Oil Combustion Sources	Stationary Comb	Nitrogen Oxide	31273	bbi	6312	mbu/bbl	FuelUsage*HHV*EF*ConvLkg*ConvMmbu/bbl	261.1088117	lb/month	0.118437106	MT/month	35.29425747
Oct	2007	Fuel Oil Combustion Sources	Stationary Comb	Carbon Dioxide	35140	bbi	6312	mbu/bbl	FuelUsage*HHV*EF*ConvLkg*ConvMmbu/bbl	38723361.46	lb/month	16657.45637	MT/month	16657.45637
Oct	2007	Fuel Oil Combustion Sources	Stationary Comb	Methane	35140	bbi	6312	mbu/bbl	FuelUsage*HHV*EF*ConvLkg*ConvMmbu/bbl	1466.978487	lb/month	0.66541104	MT/month	16.835276
Oct	2007	Fuel Oil Combustion Sources	Stationary Comb	Nitrogen Oxide	35140	bbi	6312	mbu/bbl	FuelUsage*HHV*EF*ConvLkg*ConvMmbu/bbl	293.3956974	lb/month	0.133082208	MT/month	39.65849788
Nov	2007	Fuel Oil Combustion Sources	Stationary Comb	Carbon Dioxide	32072	bbi	6312	mbu/bbl	FuelUsage*HHV*EF*ConvLkg*ConvMmbu/bbl	33517121.48	lb/month	15203.12865	MT/month	15203.12865
Nov	2007	Fuel Oil Combustion Sources	Stationary Comb	Methane	32072	bbi	6312	mbu/bbl	FuelUsage*HHV*EF*ConvLkg*ConvMmbu/bbl	1338.89966	lb/month	0.607315392	MT/month	15.1828848
Nov	2007	Fuel Oil Combustion Sources	Stationary Comb	Nitrogen Oxide	32072	bbi	6312	mbu/bbl	FuelUsage*HHV*EF*ConvLkg*ConvMmbu/bbl	267.7799319	lb/month	0.121463078	MT/month	36.19599736
Dec	2007	Fuel Oil Combustion Sources	Stationary Comb	Carbon Dioxide	34128	bbi	6312	mbu/bbl	FuelUsage*HHV*EF*ConvLkg*ConvMmbu/bbl	35665762.09	lb/month	16177.73679	MT/month	16177.73679
Dec	2007	Fuel Oil Combustion Sources	Stationary Comb	Methane	34128	bbi	6312	mbu/bbl	FuelUsage*HHV*EF*ConvLkg*ConvMmbu/bbl	1424.730842	lb/month	0.646247808	MT/month	16.1561962
Dec	2007	Fuel Oil Combustion Sources	Stationary Comb	Nitrogen Oxide	34128	bbi	6312	mbu/bbl	FuelUsage*HHV*EF*ConvLkg*ConvMmbu/bbl	284.9461965	lb/month	0.129249562	MT/month	38.51636936
Jan	2006	Fuel Oil Combustion Sources	Stationary Comb	Carbon Dioxide	35662	bbi	6312	mbu/bbl	FuelUsage*HHV*EF*ConvLkg*ConvMmbu/bbl	37268882.08	lb/month	16904.90065	MT/month	16904.90065
Jan	2006	Fuel Oil Combustion Sources	Stationary Comb	Methane	35662	bbi	6312	mbu/bbl	FuelUsage*HHV*EF*ConvLkg*ConvMmbu/bbl	1488.772526	lb/month	0.675295632	MT/month	16.8823908

Jan	2006	Fuel Oil Combustion Sources	Stationary Comb	Nitrogen Oxide	35652	bbi	6312	mtbu/bbl	FuelUsage*HHV*EF*ConvLkg*ConvMmbuMbu	297.75405126	lb/month	0.135059126	MT/month	40.24761967
Feb	2006	Fuel Oil Combustion Sources	Stationary Comb	Carbon Dioxide	26270	bbi	6312	mtbu/bbl	FuelUsage*HHV*EF*ConvLkg*ConvMmbuMbu	2745.669111	lb/month	12452.79962	MT/month	12452.79962
Feb	2006	Fuel Oil Combustion Sources	Stationary Comb	Methane	26270	bbi	6312	mtbu/bbl	FuelUsage*HHV*EF*ConvLkg*ConvMmbuMbu	1096.665597	lb/month	0.4974472	MT/month	12.436218
Feb	2006	Fuel Oil Combustion Sources	Stationary Comb	Nitrogen Oxide	26270	bbi	6312	mtbu/bbl	FuelUsage*HHV*EF*ConvLkg*ConvMmbuMbu	219.3370794	lb/month	0.099489744	MT/month	28.64794371
Mar	2006	Fuel Oil Combustion Sources	Stationary Comb	Carbon Dioxide	35918	bbi	6312	mtbu/bbl	FuelUsage*HHV*EF*ConvLkg*ConvMmbuMbu	3753.84171	lb/month	17026.25284	MT/month	17026.25284
Mar	2006	Fuel Oil Combustion Sources	Stationary Comb	Methane	35918	bbi	6312	mtbu/bbl	FuelUsage*HHV*EF*ConvLkg*ConvMmbuMbu	1499.457407	lb/month	0.680143248	MT/month	17.0035612
Mar	2006	Fuel Oil Combustion Sources	Stationary Comb	Nitrogen Oxide	35918	bbi	6312	mtbu/bbl	FuelUsage*HHV*EF*ConvLkg*ConvMmbuMbu	289.8914815	lb/month	0.13602865	MT/month	40.53653758
Apr	2006	Fuel Oil Combustion Sources	Stationary Comb	Carbon Dioxide	34843	bbi	6312	mtbu/bbl	FuelUsage*HHV*EF*ConvLkg*ConvMmbuMbu	364.1297903	lb/month	16516.6691	MT/month	16516.6691
Apr	2006	Fuel Oil Combustion Sources	Stationary Comb	Methane	34843	bbi	6312	mtbu/bbl	FuelUsage*HHV*EF*ConvLkg*ConvMmbuMbu	1454.579722	lb/month	0.659787048	MT/month	16.4946762
Apr	2006	Fuel Oil Combustion Sources	Stationary Comb	Nitrogen Oxide	34843	bbi	6312	mtbu/bbl	FuelUsage*HHV*EF*ConvLkg*ConvMmbuMbu	290.9159444	lb/month	0.13195741	MT/month	39.32308606
May	2006	Fuel Oil Combustion Sources	Stationary Comb	Carbon Dioxide	35450	bbi	6312	mtbu/bbl	FuelUsage*HHV*EF*ConvLkg*ConvMmbuMbu	3704.729784	lb/month	16804.40604	MT/month	16804.40604
May	2006	Fuel Oil Combustion Sources	Stationary Comb	Methane	35450	bbi	6312	mtbu/bbl	FuelUsage*HHV*EF*ConvLkg*ConvMmbuMbu	1479.919959	lb/month	0.6712812	MT/month	16.78203
May	2006	Fuel Oil Combustion Sources	Stationary Comb	Nitrogen Oxide	35450	bbi	6312	mtbu/bbl	FuelUsage*HHV*EF*ConvLkg*ConvMmbuMbu	295.9939918	lb/month	0.13425624	MT/month	40.00839552
Jun	2006	Fuel Oil Combustion Sources	Stationary Comb	Carbon Dioxide	31973	bbi	6312	mtbu/bbl	FuelUsage*HHV*EF*ConvLkg*ConvMmbuMbu	334.166067	lb/month	15156.19956	MT/month	15156.19956
Jun	2006	Fuel Oil Combustion Sources	Stationary Comb	Methane	31973	bbi	6312	mtbu/bbl	FuelUsage*HHV*EF*ConvLkg*ConvMmbuMbu	1334.766738	lb/month	0.609540728	MT/month	15.1360182
Jun	2006	Fuel Oil Combustion Sources	Stationary Comb	Nitrogen Oxide	31973	bbi	6312	mtbu/bbl	FuelUsage*HHV*EF*ConvLkg*ConvMmbuMbu	266.953476	lb/month	0.121008146	MT/month	36.09428739
Jul	2006	Fuel Oil Combustion Sources	Stationary Comb	Carbon Dioxide	32727	bbi	6312	mtbu/bbl	FuelUsage*HHV*EF*ConvLkg*ConvMmbuMbu	3420.16349	lb/month	15513.61908	MT/month	15513.61908
Jul	2006	Fuel Oil Combustion Sources	Stationary Comb	Methane	32727	bbi	6312	mtbu/bbl	FuelUsage*HHV*EF*ConvLkg*ConvMmbuMbu	1366.243728	lb/month	0.619718472	MT/month	15.4929618
Jul	2006	Fuel Oil Combustion Sources	Stationary Comb	Nitrogen Oxide	32727	bbi	6312	mtbu/bbl	FuelUsage*HHV*EF*ConvLkg*ConvMmbuMbu	273.2487475	lb/month	0.123943694	MT/month	36.93522093
Aug	2006	Fuel Oil Combustion Sources	Stationary Comb	Carbon Dioxide	35127	bbi	6312	mtbu/bbl	FuelUsage*HHV*EF*ConvLkg*ConvMmbuMbu	36709775.7	lb/month	16651.29396	MT/month	16651.29396
Aug	2006	Fuel Oil Combustion Sources	Stationary Comb	Methane	35127	bbi	6312	mtbu/bbl	FuelUsage*HHV*EF*ConvLkg*ConvMmbuMbu	1466.43578	lb/month	0.665164872	MT/month	16.6291218
Aug	2006	Fuel Oil Combustion Sources	Stationary Comb	Nitrogen Oxide	35127	bbi	6312	mtbu/bbl	FuelUsage*HHV*EF*ConvLkg*ConvMmbuMbu	293.287156	lb/month	0.133032974	MT/month	39.64382637
Sep	2006	Fuel Oil Combustion Sources	Stationary Comb	Carbon Dioxide	32895	bbi	6312	mtbu/bbl	FuelUsage*HHV*EF*ConvLkg*ConvMmbuMbu	34377204.76	lb/month	15593.25632	MT/month	15593.25632
Sep	2006	Fuel Oil Combustion Sources	Stationary Comb	Methane	32895	bbi	6312	mtbu/bbl	FuelUsage*HHV*EF*ConvLkg*ConvMmbuMbu	1373.257181	lb/month	0.62289972	MT/month	15.572493
Sep	2006	Fuel Oil Combustion Sources	Stationary Comb	Nitrogen Oxide	32895	bbi	6312	mtbu/bbl	FuelUsage*HHV*EF*ConvLkg*ConvMmbuMbu	274.6514361	lb/month	0.124579944	MT/month	37.12482331
Oct	2006	Fuel Oil Combustion Sources	Stationary Comb	Carbon Dioxide	25757	bbi	6312	mtbu/bbl	FuelUsage*HHV*EF*ConvLkg*ConvMmbuMbu	26917576.01	lb/month	12209.62162	MT/month	12209.62162
Oct	2006	Fuel Oil Combustion Sources	Stationary Comb	Methane	25757	bbi	6312	mtbu/bbl	FuelUsage*HHV*EF*ConvLkg*ConvMmbuMbu	1075.269348	lb/month	0.487734552	MT/month	12.1933638
Oct	2006	Fuel Oil Combustion Sources	Stationary Comb	Nitrogen Oxide	25757	bbi	6312	mtbu/bbl	FuelUsage*HHV*EF*ConvLkg*ConvMmbuMbu	215.0536966	lb/month	0.09754691	MT/month	29.0689793
Nov	2006	Fuel Oil Combustion Sources	Stationary Comb	Carbon Dioxide	33146	bbi	6312	mtbu/bbl	FuelUsage*HHV*EF*ConvLkg*ConvMmbuMbu	34639514.48	lb/month	15712.23816	MT/month	15712.23816
Nov	2006	Fuel Oil Combustion Sources	Stationary Comb	Methane	33146	bbi	6312	mtbu/bbl	FuelUsage*HHV*EF*ConvLkg*ConvMmbuMbu	1383.735598	lb/month	0.627652656	MT/month	15.6913164
Nov	2006	Fuel Oil Combustion Sources	Stationary Comb	Nitrogen Oxide	33146	bbi	6312	mtbu/bbl	FuelUsage*HHV*EF*ConvLkg*ConvMmbuMbu	276.7471197	lb/month	0.125530531	MT/month	37.4080983
Dec	2006	Fuel Oil Combustion Sources	Stationary Comb	Carbon Dioxide	32487	bbi	6312	mtbu/bbl	FuelUsage*HHV*EF*ConvLkg*ConvMmbuMbu	33950820.82	lb/month	15399.85159	MT/month	15399.85159
Dec	2006	Fuel Oil Combustion Sources	Stationary Comb	Methane	32487	bbi	6312	mtbu/bbl	FuelUsage*HHV*EF*ConvLkg*ConvMmbuMbu	1356.224534	lb/month	0.615173932	MT/month	15.3793458
Dec	2006	Fuel Oil Combustion Sources	Stationary Comb	Nitrogen Oxide	32487	bbi	6312	mtbu/bbl	FuelUsage*HHV*EF*ConvLkg*ConvMmbuMbu	271.2449067	lb/month	0.123034766	MT/month	36.66436039

Attachment V
GHG Calculations 2006-2010.xlsx
H2 Manufac

Month	Year	Process Unit	Emission Scenario	GHG Species	Feedstock Volume (kg/yr)	Units	Carbon Content (Carbon Content)	Units	Molecular Weight (lb/lb Fuel)	Units	Feedstock Volume at STP (Feedstock)	Units	Emission Rate Expression	Units	Converted Rate	Units	MT/ton	Comments
Jan	2010	Unit 57 - Hydrogen Manufacturing	Hydrogen Plant	Carbon Dioxide	4031.292202	mt	0.786	lb	29.24	lb/mol	Feedstock Volume at STP (Feedstock) / (80 + STPConv) / 423.153812	mt	44.12 * FeedstockCalc * CarbonContent * ConvLb * ConvLb * ConvLb	lb/month	452.250268	lb/month	452.250268	
Feb	2010	Unit 57 - Hydrogen Manufacturing	Hydrogen Plant	Carbon Dioxide	3709.348444	mt	0.786	lb	29.24	lb/mol	Feedstock * (80 + STPConv) / 423.153812	mt	44.12 * FeedstockCalc * CarbonContent * ConvLb * ConvLb * ConvLb	lb/month	461.724428	lb/month	461.724428	
Mar	2010	Unit 57 - Hydrogen Manufacturing	Hydrogen Plant	Carbon Dioxide	3641.360891	mt	0.791	lb	28.54	lb/mol	Feedstock * (80 + STPConv) / 423.153812	mt	44.12 * FeedstockCalc * CarbonContent * ConvLb * ConvLb * ConvLb	lb/month	468.0178524	lb/month	468.0178524	
Apr	2010	Unit 57 - Hydrogen Manufacturing	Hydrogen Plant	Carbon Dioxide	3700.61974	mt	0.7914	lb	27.05	lb/mol	Feedstock * (80 + STPConv) / 423.153812	mt	44.12 * FeedstockCalc * CarbonContent * ConvLb * ConvLb * ConvLb	lb/month	472.488008	lb/month	472.488008	
May	2010	Unit 57 - Hydrogen Manufacturing	Hydrogen Plant	Carbon Dioxide	3114.524672	mt	0.7914	lb	28.7631035	lb/mol	Feedstock * (80 + STPConv) / 423.153812	mt	44.12 * FeedstockCalc * CarbonContent * ConvLb * ConvLb * ConvLb	lb/month	446.727812	lb/month	446.727812	
Jun	2010	Unit 57 - Hydrogen Manufacturing	Hydrogen Plant	Carbon Dioxide	3100.334108	mt	0.79276748	lb	27.30146513	lb/mol	Feedstock * (80 + STPConv) / 423.153812	mt	44.12 * FeedstockCalc * CarbonContent * ConvLb * ConvLb * ConvLb	lb/month	451.1237857	lb/month	451.1237857	
Jul	2010	Unit 57 - Hydrogen Manufacturing	Hydrogen Plant	Carbon Dioxide	3002.452712	mt	0.797075854	lb	28.1445878	lb/mol	Feedstock * (80 + STPConv) / 423.153812	mt	44.12 * FeedstockCalc * CarbonContent * ConvLb * ConvLb * ConvLb	lb/month	461.687679	lb/month	461.687679	
Aug	2010	Unit 57 - Hydrogen Manufacturing	Hydrogen Plant	Carbon Dioxide	3023.013885	mt	0.797102798	lb	29.3555819	lb/mol	Feedstock * (80 + STPConv) / 423.153812	mt	44.12 * FeedstockCalc * CarbonContent * ConvLb * ConvLb * ConvLb	lb/month	469.2991257	lb/month	469.2991257	
Sep	2010	Unit 57 - Hydrogen Manufacturing	Hydrogen Plant	Carbon Dioxide	3072.58834	mt	0.789768652	lb	28.0482478	lb/mol	Feedstock * (80 + STPConv) / 423.153812	mt	44.12 * FeedstockCalc * CarbonContent * ConvLb * ConvLb * ConvLb	lb/month	462.853715	lb/month	462.853715	
Oct	2010	Unit 57 - Hydrogen Manufacturing	Hydrogen Plant	Carbon Dioxide	4079.26831	mt	0.78582187	lb	28.6100382	lb/mol	Feedstock * (80 + STPConv) / 423.153812	mt	44.12 * FeedstockCalc * CarbonContent * ConvLb * ConvLb * ConvLb	lb/month	498.8741507	lb/month	498.8741507	
Nov	2010	Unit 57 - Hydrogen Manufacturing	Hydrogen Plant	Carbon Dioxide	3233.722972	mt	0.787282631	lb	28.4602612	lb/mol	Feedstock * (80 + STPConv) / 423.153812	mt	44.12 * FeedstockCalc * CarbonContent * ConvLb * ConvLb * ConvLb	lb/month	478.4787624	lb/month	478.4787624	
Dec	2010	Unit 57 - Hydrogen Manufacturing	Hydrogen Plant	Carbon Dioxide	3528.85467	mt	0.808	lb	27.324	lb/mol	Feedstock * (80 + STPConv) / 423.153812	mt	44.12 * FeedstockCalc * CarbonContent * ConvLb * ConvLb * ConvLb	lb/month	533.4873575	lb/month	533.4873575	
Jan	2009	Unit 57 - Hydrogen Manufacturing	Hydrogen Plant	Carbon Dioxide	3558.894211	mt	0.8018822	lb	31.7297275	lb/mol	Feedstock * (80 + STPConv) / 423.153812	mt	44.12 * FeedstockCalc * CarbonContent * ConvLb * ConvLb * ConvLb	lb/month	585.3713781	lb/month	585.3713781	
Feb	2009	Unit 57 - Hydrogen Manufacturing	Hydrogen Plant	Carbon Dioxide	3543.894567	mt	0.79383563	lb	27.89133218	lb/mol	Feedstock * (80 + STPConv) / 423.153812	mt	44.12 * FeedstockCalc * CarbonContent * ConvLb * ConvLb * ConvLb	lb/month	530.085544	lb/month	530.085544	
Mar	2009	Unit 57 - Hydrogen Manufacturing	Hydrogen Plant	Carbon Dioxide	4079.473648	mt	0.820265	lb	33.14835185	lb/mol	Feedstock * (80 + STPConv) / 423.153812	mt	44.12 * FeedstockCalc * CarbonContent * ConvLb * ConvLb * ConvLb	lb/month	545.2701153	lb/month	545.2701153	
Apr	2009	Unit 57 - Hydrogen Manufacturing	Hydrogen Plant	Carbon Dioxide	3903.378972	mt	0.783204648	lb	27.89133218	lb/mol	Feedstock * (80 + STPConv) / 423.153812	mt	44.12 * FeedstockCalc * CarbonContent * ConvLb * ConvLb * ConvLb	lb/month	522.406555	lb/month	522.406555	
May	2009	Unit 57 - Hydrogen Manufacturing	Hydrogen Plant	Carbon Dioxide	4088.018012	mt	0.79854277	lb	28.8933895	lb/mol	Feedstock * (80 + STPConv) / 423.153812	mt	44.12 * FeedstockCalc * CarbonContent * ConvLb * ConvLb * ConvLb	lb/month	483.0420288	lb/month	483.0420288	
Jun	2009	Unit 57 - Hydrogen Manufacturing	Hydrogen Plant	Carbon Dioxide	3688.718173	mt	0.78188887	lb	28.7547143	lb/mol	Feedstock * (80 + STPConv) / 423.153812	mt	44.12 * FeedstockCalc * CarbonContent * ConvLb * ConvLb * ConvLb	lb/month	501.3771813	lb/month	501.3771813	
Jul	2009	Unit 57 - Hydrogen Manufacturing	Hydrogen Plant	Carbon Dioxide	4283.165184	mt	0.7979289	lb	29.1653878	lb/mol	Feedstock * (80 + STPConv) / 423.153812	mt	44.12 * FeedstockCalc * CarbonContent * ConvLb * ConvLb * ConvLb	lb/month	434.4129394	lb/month	434.4129394	
Aug	2009	Unit 57 - Hydrogen Manufacturing	Hydrogen Plant	Carbon Dioxide	3602.251782	mt	0.788475087	lb	30.42184881	lb/mol	Feedstock * (80 + STPConv) / 423.153812	mt	44.12 * FeedstockCalc * CarbonContent * ConvLb * ConvLb * ConvLb	lb/month	383.7657431	lb/month	383.7657431	
Sep	2009	Unit 57 - Hydrogen Manufacturing	Hydrogen Plant	Carbon Dioxide	3821.250881	mt	0.788591977	lb	30.03760296	lb/mol	Feedstock * (80 + STPConv) / 423.153812	mt	44.12 * FeedstockCalc * CarbonContent * ConvLb * ConvLb * ConvLb	lb/month	429.455568	lb/month	429.455568	
Oct	2009	Unit 57 - Hydrogen Manufacturing	Hydrogen Plant	Carbon Dioxide	3974.415581	mt	0.788787284	lb	28.87770238	lb/mol	Feedstock * (80 + STPConv) / 423.153812	mt	44.12 * FeedstockCalc * CarbonContent * ConvLb * ConvLb * ConvLb	lb/month	467.0537518	lb/month	467.0537518	
Nov	2009	Unit 57 - Hydrogen Manufacturing	Hydrogen Plant	Carbon Dioxide	3807.280878	mt	0.788520087	lb	28.73188897	lb/mol	Feedstock * (80 + STPConv) / 423.153812	mt	44.12 * FeedstockCalc * CarbonContent * ConvLb * ConvLb * ConvLb	lb/month	462.8083362	lb/month	462.8083362	
Dec	2009	Unit 57 - Hydrogen Manufacturing	Hydrogen Plant	Carbon Dioxide	3800.560589	mt	0.788833373	lb	30.44804814	lb/mol	Feedstock * (80 + STPConv) / 423.153812	mt	44.12 * FeedstockCalc * CarbonContent * ConvLb * ConvLb * ConvLb	lb/month	472.7339103	lb/month	472.7339103	
Jan	2008	Unit 57 - Hydrogen Manufacturing	Hydrogen Plant	Carbon Dioxide	12302.73532	mt	0.718	lb	18.15424881	lb/mol	Feedstock * (80 + STPConv) / 423.153812	mt	44.12 * FeedstockCalc * CarbonContent * ConvLb * ConvLb * ConvLb	lb/month	712.2877880	lb/month	712.2877880	
Feb	2008	Unit 57 - Hydrogen Manufacturing	Hydrogen Plant	Carbon Dioxide	5832.487184	mt	0.718	lb	18.15424881	lb/mol	Feedstock * (80 + STPConv) / 423.153812	mt	44.12 * FeedstockCalc * CarbonContent * ConvLb * ConvLb * ConvLb	lb/month	514.8382141	lb/month	514.8382141	
Mar	2008	Unit 57 - Hydrogen Manufacturing	Hydrogen Plant	Carbon Dioxide	12978.84824	mt	0.718	lb	18.15424881	lb/mol	Feedstock * (80 + STPConv) / 423.153812	mt	44.12 * FeedstockCalc * CarbonContent * ConvLb * ConvLb * ConvLb	lb/month	780.4008531	lb/month	780.4008531	
Apr	2008	Unit 57 - Hydrogen Manufacturing	Hydrogen Plant	Carbon Dioxide	1883.882189	mt	0.718	lb	18.15424881	lb/mol	Feedstock * (80 + STPConv) / 423.153812	mt	44.12 * FeedstockCalc * CarbonContent * ConvLb * ConvLb * ConvLb	lb/month	111.8203785	lb/month	111.8203785	
May	2008	Unit 57 - Hydrogen Manufacturing	Hydrogen Plant	Carbon Dioxide	5467.118871	mt	0.718	lb	18.15424881	lb/mol	Feedstock * (80 + STPConv) / 423.153812	mt	44.12 * FeedstockCalc * CarbonContent * ConvLb * ConvLb * ConvLb	lb/month	328.4356407	lb/month	328.4356407	
Jun	2008	Unit 57 - Hydrogen Manufacturing	Hydrogen Plant	Carbon Dioxide	14088.71377	mt	0.718	lb	18.15424881	lb/mol	Feedstock * (80 + STPConv) / 423.153812	mt	44.12 * FeedstockCalc * CarbonContent * ConvLb * ConvLb * ConvLb	lb/month	650.52341	lb/month	650.52341	
Jul	2008	Unit 57 - Hydrogen Manufacturing	Hydrogen Plant	Carbon Dioxide	11584.88185	mt	0.718	lb	18.15424881	lb/mol	Feedstock * (80 + STPConv) / 423.153812	mt	44.12 * FeedstockCalc * CarbonContent * ConvLb * ConvLb * ConvLb	lb/month	700.0064207	lb/month	700.0064207	
Aug	2008	Unit 57 - Hydrogen Manufacturing	Hydrogen Plant	Carbon Dioxide	12058.38582	mt	0.718	lb	18.15424881	lb/mol	Feedstock * (80 + STPConv) / 423.153812	mt	44.12 * FeedstockCalc * CarbonContent * ConvLb * ConvLb * ConvLb	lb/month	727.8620388	lb/month	727.8620388	

Sep	2008	UW 57 - Hydrogen Manufacturing	Hydrogen Plant	Carbon Dioxide	7811.446067	mscf	0.719	lb/b	18.15942381	lb/b-mol	Feedback: (08 + STPCorr) / (00 + STPCorr)	1728.817361	mscf	1013053.488	lb/month	458.5139791	lb/month	458.5139791
Oct	2008	UW 57 - Hydrogen Manufacturing	Hydrogen Plant	Carbon Dioxide	8339.414658	mscf	0.719	lb/b	18.15942381	lb/b-mol	Feedback: (08 + STPCorr) / (00 + STPCorr)	1846.560001	mscf	1107422.888	lb/month	502.3180783	lb/month	502.3180783
Nov	2008	UW 57 - Hydrogen Manufacturing	Hydrogen Plant	Carbon Dioxide	9790.4485	mscf	0.719	lb/b	18.15942381	lb/b-mol	Feedback: (08 + STPCorr) / (00 + STPCorr)	1894.184112	mscf	1300703.201	lb/month	581.0540438	lb/month	581.0540438
Dec	2008	UW 57 - Hydrogen Manufacturing	Hydrogen Plant	Carbon Dioxide	8654.486004	mscf	0.719	lb/b	18.15942381	lb/b-mol	Feedback: (08 + STPCorr) / (00 + STPCorr)	10107.70737	mscf	1324809.424	lb/month	600.8654378	lb/month	600.8654378
Jan	2007	UW 57 - Hydrogen Manufacturing	Hydrogen Plant	Carbon Dioxide	13487.42078	mscf	0.719	lb/b	18.15942381	lb/b-mol	Feedback: (08 + STPCorr) / (00 + STPCorr)	13885.6508	mscf	1783123.038	lb/month	814.2550022	lb/month	814.2550022
Feb	2007	UW 57 - Hydrogen Manufacturing	Hydrogen Plant	Carbon Dioxide	10248.91865	mscf	0.719	lb/b	18.15942381	lb/b-mol	Feedback: (08 + STPCorr) / (00 + STPCorr)	10400.04888	mscf	1303691.886	lb/month	618.5608889	lb/month	618.5608889
Mar	2007	UW 57 - Hydrogen Manufacturing	Hydrogen Plant	Carbon Dioxide	13577.5268	mscf	0.719	lb/b	18.15942381	lb/b-mol	Feedback: (08 + STPCorr) / (00 + STPCorr)	13788.54043	mscf	1807111.107	lb/month	819.8850062	lb/month	819.8850062
Apr	2007	UW 57 - Hydrogen Manufacturing	Hydrogen Plant	Carbon Dioxide	13458.07723	mscf	0.719	lb/b	18.15942381	lb/b-mol	Feedback: (08 + STPCorr) / (00 + STPCorr)	13885.25685	mscf	1791217.531	lb/month	812.4835713	lb/month	812.4835713
May	2007	UW 57 - Hydrogen Manufacturing	Hydrogen Plant	Carbon Dioxide	14703.86554	mscf	0.719	lb/b	18.15942381	lb/b-mol	Feedback: (08 + STPCorr) / (00 + STPCorr)	14830.02294	mscf	1857000.871	lb/month	837.8871188	lb/month	837.8871188
Jun	2007	UW 57 - Hydrogen Manufacturing	Hydrogen Plant	Carbon Dioxide	12537.38623	mscf	0.719	lb/b	18.15942381	lb/b-mol	Feedback: (08 + STPCorr) / (00 + STPCorr)	12700.40338	mscf	1688670.751	lb/month	758.8066884	lb/month	758.8066884
Jul	2007	UW 57 - Hydrogen Manufacturing	Hydrogen Plant	Carbon Dioxide	13300.31194	mscf	0.719	lb/b	18.15942381	lb/b-mol	Feedback: (08 + STPCorr) / (00 + STPCorr)	13504.87888	mscf	1770195.628	lb/month	802.3441858	lb/month	802.3441858
Aug	2007	UW 57 - Hydrogen Manufacturing	Hydrogen Plant	Carbon Dioxide	13288.57442	mscf	0.719	lb/b	18.15942381	lb/b-mol	Feedback: (08 + STPCorr) / (00 + STPCorr)	13501.26881	mscf	1789723.137	lb/month	802.7354128	lb/month	802.7354128
Sep	2007	UW 57 - Hydrogen Manufacturing	Hydrogen Plant	Carbon Dioxide	12515.85108	mscf	0.719	lb/b	18.15942381	lb/b-mol	Feedback: (08 + STPCorr) / (00 + STPCorr)	12708.21885	mscf	1685770.981	lb/month	758.5819057	lb/month	758.5819057
Oct	2007	UW 57 - Hydrogen Manufacturing	Hydrogen Plant	Carbon Dioxide	13485.88713	mscf	0.719	lb/b	18.15942381	lb/b-mol	Feedback: (08 + STPCorr) / (00 + STPCorr)	13683.58682	mscf	1794832.228	lb/month	814.188532	lb/month	814.188532
Nov	2007	UW 57 - Hydrogen Manufacturing	Hydrogen Plant	Carbon Dioxide	8971.890121	mscf	0.719	lb/b	18.15942381	lb/b-mol	Feedback: (08 + STPCorr) / (00 + STPCorr)	9118.304122	mscf	1273889.188	lb/month	577.8724818	lb/month	577.8724818
Dec	2007	UW 57 - Hydrogen Manufacturing	Hydrogen Plant	Carbon Dioxide	14783.85752	mscf	0.719	lb/b	18.15942381	lb/b-mol	Feedback: (08 + STPCorr) / (00 + STPCorr)	14980.83297	mscf	1884871.88	lb/month	831.287303	lb/month	831.287303
Jan	2008	UW 57 - Hydrogen Manufacturing	Hydrogen Plant	Carbon Dioxide	13138.88222	mscf	0.719	lb/b	18.15942381	lb/b-mol	Feedback: (08 + STPCorr) / (00 + STPCorr)	13341.88818	mscf	1748840.388	lb/month	783.2818043	lb/month	783.2818043
Feb	2008	UW 57 - Hydrogen Manufacturing	Hydrogen Plant	Carbon Dioxide	9044.89195	mscf	0.719	lb/b	18.15942381	lb/b-mol	Feedback: (08 + STPCorr) / (00 + STPCorr)	9184.23375	mscf	1203853.112	lb/month	548.0582358	lb/month	548.0582358
Mar	2008	UW 57 - Hydrogen Manufacturing	Hydrogen Plant	Carbon Dioxide	8973.842078	mscf	0.719	lb/b	18.15942381	lb/b-mol	Feedback: (08 + STPCorr) / (00 + STPCorr)	9117.1871	mscf	1195662.131	lb/month	542.0717088	lb/month	542.0717088
Apr	2008	UW 57 - Hydrogen Manufacturing	Hydrogen Plant	Carbon Dioxide	13172.313	mscf	0.719	lb/b	18.15942381	lb/b-mol	Feedback: (08 + STPCorr) / (00 + STPCorr)	13314.58334	mscf	1742553.335	lb/month	781.834538	lb/month	781.834538
May	2008	UW 57 - Hydrogen Manufacturing	Hydrogen Plant	Carbon Dioxide	14297.83073	mscf	0.719	lb/b	18.15942381	lb/b-mol	Feedback: (08 + STPCorr) / (00 + STPCorr)	14507.5788	mscf	1891627.883	lb/month	862.5648149	lb/month	862.5648149
Jun	2008	UW 57 - Hydrogen Manufacturing	Hydrogen Plant	Carbon Dioxide	13338.38814	mscf	0.719	lb/b	18.15942381	lb/b-mol	Feedback: (08 + STPCorr) / (00 + STPCorr)	14051.8224	mscf	1841883.111	lb/month	835.4580475	lb/month	835.4580475
Jul	2008	UW 57 - Hydrogen Manufacturing	Hydrogen Plant	Carbon Dioxide	14358.41271	mscf	0.719	lb/b	18.15942381	lb/b-mol	Feedback: (08 + STPCorr) / (00 + STPCorr)	14580.48883	mscf	181181.764	lb/month	888.8884887	lb/month	888.8884887
Aug	2008	UW 57 - Hydrogen Manufacturing	Hydrogen Plant	Carbon Dioxide	12828.28625	mscf	0.719	lb/b	18.15942381	lb/b-mol	Feedback: (08 + STPCorr) / (00 + STPCorr)	12822.88214	mscf	1888771.884	lb/month	782.3881888	lb/month	782.3881888
Sep	2008	UW 57 - Hydrogen Manufacturing	Hydrogen Plant	Carbon Dioxide	12988.88348	mscf	0.719	lb/b	18.15942381	lb/b-mol	Feedback: (08 + STPCorr) / (00 + STPCorr)	13188.30737	mscf	1728812.273	lb/month	782.8188242	lb/month	782.8188242
Oct	2008	UW 57 - Hydrogen Manufacturing	Hydrogen Plant	Carbon Dioxide	7888.48229	mscf	0.719	lb/b	18.15942381	lb/b-mol	Feedback: (08 + STPCorr) / (00 + STPCorr)	8018.041513	mscf	1058880.884	lb/month	478.7218288	lb/month	478.7218288
Nov	2008	UW 57 - Hydrogen Manufacturing	Hydrogen Plant	Carbon Dioxide	14188.33789	mscf	0.719	lb/b	18.15942381	lb/b-mol	Feedback: (08 + STPCorr) / (00 + STPCorr)	14403.71202	mscf	1888813.085	lb/month	858.3884483	lb/month	858.3884483
Dec	2008	UW 57 - Hydrogen Manufacturing	Hydrogen Plant	Carbon Dioxide	14824.6782	mscf	0.719	lb/b	18.15942381	lb/b-mol	Feedback: (08 + STPCorr) / (00 + STPCorr)	14748.27825	mscf	183177.885	lb/month	878.8758129	lb/month	878.8758129

Month	Year	Process Unit	Emission Scenario	GHG Species	AGR Flow (Mint)	AGR Flow (Max)	AGR Multiplier	Units	Correction Factor	Tail Gas Recycle	Units	AGR Flow (Mint)	AGR Flow (Max)	Units	Emission Rate	Units	AGR Flow (Mint)	AGR Flow (Max)	Units	AGR Flow (Mint)	AGR Flow (Max)
Jan	2010	Unit 02 - Acid Plant	Sulfur Recovery	Carbon Dioxide	4103.03247	4251.10310	100	100	100	100	4251.10310	4251.10310	4251.10310	4251.10310	100	4251.10310	4251.10310	4251.10310	4251.10310	4251.10310	4251.10310
Feb	2010	Unit 02 - Acid Plant	Sulfur Recovery	Carbon Dioxide	3677.11655	3753.73828	100	100	100	100	3753.73828	3753.73828	3753.73828	3753.73828	100	3753.73828	3753.73828	3753.73828	3753.73828	3753.73828	3753.73828
Mar	2010	Unit 02 - Acid Plant	Sulfur Recovery	Carbon Dioxide	4230.85618	4239.863725	100	100	100	100	4239.863725	4239.863725	4239.863725	4239.863725	100	4239.863725	4239.863725	4239.863725	4239.863725	4239.863725	4239.863725
Apr	2010	Unit 02 - Acid Plant	Sulfur Recovery	Carbon Dioxide	3609.65506	3685.264198	100	100	100	100	3685.264198	3685.264198	3685.264198	3685.264198	100	3685.264198	3685.264198	3685.264198	3685.264198	3685.264198	3685.264198
May	2010	Unit 02 - Acid Plant	Sulfur Recovery	Carbon Dioxide	4036.16679	4121.04664	100	100	100	100	4121.04664	4121.04664	4121.04664	4121.04664	100	4121.04664	4121.04664	4121.04664	4121.04664	4121.04664	4121.04664
Jun	2010	Unit 02 - Acid Plant	Sulfur Recovery	Carbon Dioxide	3530.32842	3584.87674	100	100	100	100	3584.87674	3584.87674	3584.87674	3584.87674	100	3584.87674	3584.87674	3584.87674	3584.87674	3584.87674	3584.87674
Jul	2010	Unit 02 - Acid Plant	Sulfur Recovery	Carbon Dioxide	3538.15654	3562.617879	100	100	100	100	3562.617879	3562.617879	3562.617879	3562.617879	100	3562.617879	3562.617879	3562.617879	3562.617879	3562.617879	3562.617879
Aug	2010	Unit 02 - Acid Plant	Sulfur Recovery	Carbon Dioxide	3865.20628	3946.50018	100	100	100	100	3946.50018	3946.50018	3946.50018	3946.50018	100	3946.50018	3946.50018	3946.50018	3946.50018	3946.50018	3946.50018
Sep	2010	Unit 02 - Acid Plant	Sulfur Recovery	Carbon Dioxide	3484.874851	3546.876196	100	100	100	100	3546.876196	3546.876196	3546.876196	3546.876196	100	3546.876196	3546.876196	3546.876196	3546.876196	3546.876196	3546.876196
Oct	2010	Unit 02 - Acid Plant	Sulfur Recovery	Carbon Dioxide	3333.28652	3383.073811	100	100	100	100	3383.073811	3383.073811	3383.073811	3383.073811	100	3383.073811	3383.073811	3383.073811	3383.073811	3383.073811	3383.073811
Nov	2010	Unit 02 - Acid Plant	Sulfur Recovery	Carbon Dioxide	4711.09448	4783.61218	100	100	100	100	4783.61218	4783.61218	4783.61218	4783.61218	100	4783.61218	4783.61218	4783.61218	4783.61218	4783.61218	4783.61218
Dec	2010	Unit 02 - Acid Plant	Sulfur Recovery	Carbon Dioxide	3822.872638	3881.808691	100	100	100	100	3881.808691	3881.808691	3881.808691	3881.808691	100	3881.808691	3881.808691	3881.808691	3881.808691	3881.808691	3881.808691
Jan	2009	Unit 02 - Acid Plant	Sulfur Recovery	Carbon Dioxide	4606.812377	4675.888245	100	100	100	100	4675.888245	4675.888245	4675.888245	4675.888245	100	4675.888245	4675.888245	4675.888245	4675.888245	4675.888245	4675.888245
Feb	2009	Unit 02 - Acid Plant	Sulfur Recovery	Carbon Dioxide	3877.188241	3937.484572	100	100	100	100	3937.484572	3937.484572	3937.484572	3937.484572	100	3937.484572	3937.484572	3937.484572	3937.484572	3937.484572	3937.484572
Mar	2009	Unit 02 - Acid Plant	Sulfur Recovery	Carbon Dioxide	4141.17522	4204.89796	100	100	100	100	4204.89796	4204.89796	4204.89796	4204.89796	100	4204.89796	4204.89796	4204.89796	4204.89796	4204.89796	4204.89796
Apr	2009	Unit 02 - Acid Plant	Sulfur Recovery	Carbon Dioxide	3166.23613	3186.673104	100	100	100	100	3186.673104	3186.673104	3186.673104	3186.673104	100	3186.673104	3186.673104	3186.673104	3186.673104	3186.673104	3186.673104
May	2009	Unit 02 - Acid Plant	Sulfur Recovery	Carbon Dioxide	3857.234841	3880.054822	100	100	100	100	3880.054822	3880.054822	3880.054822	3880.054822	100	3880.054822	3880.054822	3880.054822	3880.054822	3880.054822	3880.054822
Jun	2009	Unit 02 - Acid Plant	Sulfur Recovery	Carbon Dioxide	3278.27462	3328.662465	100	100	100	100	3328.662465	3328.662465	3328.662465	3328.662465	100	3328.662465	3328.662465	3328.662465	3328.662465	3328.662465	3328.662465
Jul	2009	Unit 02 - Acid Plant	Sulfur Recovery	Carbon Dioxide	3784.60608	3842.258189	100	100	100	100	3842.258189	3842.258189	3842.258189	3842.258189	100	3842.258189	3842.258189	3842.258189	3842.258189	3842.258189	3842.258189
Aug	2009	Unit 02 - Acid Plant	Sulfur Recovery	Carbon Dioxide	3865.726653	4057.239462	100	100	100	100	4057.239462	4057.239462	4057.239462	4057.239462	100	4057.239462	4057.239462	4057.239462	4057.239462	4057.239462	4057.239462
Sep	2009	Unit 02 - Acid Plant	Sulfur Recovery	Carbon Dioxide	4333.024752	4464.896448	100	100	100	100	4464.896448	4464.896448	4464.896448	4464.896448	100	4464.896448	4464.896448	4464.896448	4464.896448	4464.896448	4464.896448
Oct	2009	Unit 02 - Acid Plant	Sulfur Recovery	Carbon Dioxide	4306.44773	4425.54017	100	100	100	100	4425.54017	4425.54017	4425.54017	4425.54017	100	4425.54017	4425.54017	4425.54017	4425.54017	4425.54017	4425.54017
Nov	2009	Unit 02 - Acid Plant	Sulfur Recovery	Carbon Dioxide	2909.351355	2974.44683	100	100	100	100	2974.44683	2974.44683	2974.44683	2974.44683	100	2974.44683	2974.44683	2974.44683	2974.44683	2974.44683	2974.44683
Dec	2009	Unit 02 - Acid Plant	Sulfur Recovery	Carbon Dioxide	4185.03389	4249.83454	100	100	100	100	4249.83454	4249.83454	4249.83454	4249.83454	100	4249.83454	4249.83454	4249.83454	4249.83454	4249.83454	4249.83454
Jan	2008	Unit 02 - Acid Plant	Sulfur Recovery	Carbon Dioxide	4644.714248	4708.960514	100	100	100	100	4708.960514	4708.960514	4708.960514	4708.960514	100	4708.960514	4708.960514	4708.960514	4708.960514	4708.960514	4708.960514
Feb	2008	Unit 02 - Acid Plant	Sulfur Recovery	Carbon Dioxide	4332.116488	4388.246825	100	100	100	100	4388.246825	4388.246825	4388.246825	4388.246825	100	4388.246825	4388.246825	4388.246825	4388.246825	4388.246825	4388.246825
Mar	2008	Unit 02 - Acid Plant	Sulfur Recovery	Carbon Dioxide	4669.854173	4740.631252	100	100	100	100	4740.631252	4740.631252	4740.631252	4740.631252	100	4740.631252	4740.631252	4740.631252	4740.631252	4740.631252	4740.631252
Apr	2008	Unit 02 - Acid Plant	Sulfur Recovery	Carbon Dioxide	429.254577	436.4615379	100	100	100	100	436.4615379	436.4615379	436.4615379	436.4615379	100	436.4615379	436.4615379	436.4615379	436.4615379	436.4615379	436.4615379
May	2008	Unit 02 - Acid Plant	Sulfur Recovery	Carbon Dioxide	1836.03825	1884.55038	100	100	100	100	1884.55038	1884.55038	1884.55038	1884.55038	100	1884.55038	1884.55038	1884.55038	1884.55038	1884.55038	1884.55038
Jun	2008	Unit 02 - Acid Plant	Sulfur Recovery	Carbon Dioxide	4756.281992	4827.552238	100	100	100	100	4827.552238	4827.552238	4827.552238	4827.552238	100	4827.552238	4827.552238	4827.552238	4827.552238	4827.552238	4827.552238
Jul	2008	Unit 02 - Acid Plant	Sulfur Recovery	Carbon Dioxide	4570.434325	4640.792418	100	100	100	100	4640.792418	4640.792418	4640.792418	4640.792418	100	4640.792418	4640.792418	4640.792418	4640.792418	4640.792418	4640.792418
Aug	2008	Unit 02 - Acid Plant	Sulfur Recovery	Carbon Dioxide	4714.35885	4786.933411	100	100	100	100	4786.933411	4786.933411	4786.933411	4786.933411	100	4786.933411	4786.933411	4786.933411	4786.933411	4786.933411	4786.933411
Sep	2008	Unit 02 - Acid Plant	Sulfur Recovery	Carbon Dioxide	4191.28208	4215.188377	100	100	100	100	4215.188377	4215.188377	4215.188377	4215.188377	100	4215.188377	4215.188377	4215.188377	4215.188377	4215.188377	4215.188377
Oct	2008	Unit 02 - Acid Plant	Sulfur Recovery	Carbon Dioxide	4462.091581	4469.824641	100	100	100	100	4469.824641	4469.824641	4469.824641	4469.824641	100	4469.824641	4469.824641	4469.824641	4469.824641	4469.824641	4469.824641
Nov	2008	Unit 02 - Acid Plant	Sulfur Recovery	Carbon Dioxide	4273.22877	4339.00038	100	100	100	100	4339.00038	4339.00038	4339.00038	4339.00038	100	4339.00038	4339.00038	4339.00038	4339.00038	4339.00038	4339.00038

Dec	2008	Unit 02 - Acid Plant	Sulfur Recovery	Carbon Dioxide	4102.719513	%	100	%	Fluoride (68 + STPConv) / (68 + STPConv)	4183.878234	meq	meq	100	meq	43.1544775	MT/month	43.1544775
Jan	2007	Unit 02 - Acid Plant <td>Sulfur Recovery <td>Carbon Dioxide <th>5182.472409</th> <td>% <td>100</td> <td>% <td>Fluoride (68 + STPConv) / (68 + STPConv) <th>3032.263231</th> <td>meq</td> <td>meq <td>100</td> <td>meq <th>120.7778455</th> <td>MT/month <th>120.7778455</th> </td></td></td></td></td></td></td></td>	Sulfur Recovery <td>Carbon Dioxide <th>5182.472409</th> <td>% <td>100</td> <td>% <td>Fluoride (68 + STPConv) / (68 + STPConv) <th>3032.263231</th> <td>meq</td> <td>meq <td>100</td> <td>meq <th>120.7778455</th> <td>MT/month <th>120.7778455</th> </td></td></td></td></td></td></td>	Carbon Dioxide <th>5182.472409</th> <td>% <td>100</td> <td>% <td>Fluoride (68 + STPConv) / (68 + STPConv) <th>3032.263231</th> <td>meq</td> <td>meq <td>100</td> <td>meq <th>120.7778455</th> <td>MT/month <th>120.7778455</th> </td></td></td></td></td></td>	5182.472409	% <td>100</td> <td>% <td>Fluoride (68 + STPConv) / (68 + STPConv) <th>3032.263231</th> <td>meq</td> <td>meq <td>100</td> <td>meq <th>120.7778455</th> <td>MT/month <th>120.7778455</th> </td></td></td></td></td>	100	% <td>Fluoride (68 + STPConv) / (68 + STPConv) <th>3032.263231</th> <td>meq</td> <td>meq <td>100</td> <td>meq <th>120.7778455</th> <td>MT/month <th>120.7778455</th> </td></td></td></td>	Fluoride (68 + STPConv) / (68 + STPConv) <th>3032.263231</th> <td>meq</td> <td>meq <td>100</td> <td>meq <th>120.7778455</th> <td>MT/month <th>120.7778455</th> </td></td></td>	3032.263231	meq	meq <td>100</td> <td>meq <th>120.7778455</th> <td>MT/month <th>120.7778455</th> </td></td>	100	meq <th>120.7778455</th> <td>MT/month <th>120.7778455</th> </td>	120.7778455	MT/month <th>120.7778455</th>	120.7778455
Feb	2007	Unit 02 - Acid Plant <td>Sulfur Recovery <td>Carbon Dioxide <th>3384.332638</th> <td>% <td>100</td> <td>% <td>Fluoride (68 + STPConv) / (68 + STPConv) <th>3448.546497</th> <td>meq</td> <td>meq <td>100</td> <td>meq <th>35.70289435</th> <td>MT/month <th>35.70289435</th> </td></td></td></td></td></td></td></td>	Sulfur Recovery <td>Carbon Dioxide <th>3384.332638</th> <td>% <td>100</td> <td>% <td>Fluoride (68 + STPConv) / (68 + STPConv) <th>3448.546497</th> <td>meq</td> <td>meq <td>100</td> <td>meq <th>35.70289435</th> <td>MT/month <th>35.70289435</th> </td></td></td></td></td></td></td>	Carbon Dioxide <th>3384.332638</th> <td>% <td>100</td> <td>% <td>Fluoride (68 + STPConv) / (68 + STPConv) <th>3448.546497</th> <td>meq</td> <td>meq <td>100</td> <td>meq <th>35.70289435</th> <td>MT/month <th>35.70289435</th> </td></td></td></td></td></td>	3384.332638	% <td>100</td> <td>% <td>Fluoride (68 + STPConv) / (68 + STPConv) <th>3448.546497</th> <td>meq</td> <td>meq <td>100</td> <td>meq <th>35.70289435</th> <td>MT/month <th>35.70289435</th> </td></td></td></td></td>	100	% <td>Fluoride (68 + STPConv) / (68 + STPConv) <th>3448.546497</th> <td>meq</td> <td>meq <td>100</td> <td>meq <th>35.70289435</th> <td>MT/month <th>35.70289435</th> </td></td></td></td>	Fluoride (68 + STPConv) / (68 + STPConv) <th>3448.546497</th> <td>meq</td> <td>meq <td>100</td> <td>meq <th>35.70289435</th> <td>MT/month <th>35.70289435</th> </td></td></td>	3448.546497	meq	meq <td>100</td> <td>meq <th>35.70289435</th> <td>MT/month <th>35.70289435</th> </td></td>	100	meq <th>35.70289435</th> <td>MT/month <th>35.70289435</th> </td>	35.70289435	MT/month <th>35.70289435</th>	35.70289435
Mar	2007	Unit 02 - Acid Plant <td>Sulfur Recovery <td>Carbon Dioxide <th>4161.90791</th> <td>% <td>100</td> <td>% <td>Fluoride (68 + STPConv) / (68 + STPConv) <th>4229.878885</th> <td>meq</td> <td>meq <td>100</td> <td>meq <th>43.77704131</th> <td>MT/month <th>43.77704131</th> </td></td></td></td></td></td></td></td>	Sulfur Recovery <td>Carbon Dioxide <th>4161.90791</th> <td>% <td>100</td> <td>% <td>Fluoride (68 + STPConv) / (68 + STPConv) <th>4229.878885</th> <td>meq</td> <td>meq <td>100</td> <td>meq <th>43.77704131</th> <td>MT/month <th>43.77704131</th> </td></td></td></td></td></td></td>	Carbon Dioxide <th>4161.90791</th> <td>% <td>100</td> <td>% <td>Fluoride (68 + STPConv) / (68 + STPConv) <th>4229.878885</th> <td>meq</td> <td>meq <td>100</td> <td>meq <th>43.77704131</th> <td>MT/month <th>43.77704131</th> </td></td></td></td></td></td>	4161.90791	% <td>100</td> <td>% <td>Fluoride (68 + STPConv) / (68 + STPConv) <th>4229.878885</th> <td>meq</td> <td>meq <td>100</td> <td>meq <th>43.77704131</th> <td>MT/month <th>43.77704131</th> </td></td></td></td></td>	100	% <td>Fluoride (68 + STPConv) / (68 + STPConv) <th>4229.878885</th> <td>meq</td> <td>meq <td>100</td> <td>meq <th>43.77704131</th> <td>MT/month <th>43.77704131</th> </td></td></td></td>	Fluoride (68 + STPConv) / (68 + STPConv) <th>4229.878885</th> <td>meq</td> <td>meq <td>100</td> <td>meq <th>43.77704131</th> <td>MT/month <th>43.77704131</th> </td></td></td>	4229.878885	meq	meq <td>100</td> <td>meq <th>43.77704131</th> <td>MT/month <th>43.77704131</th> </td></td>	100	meq <th>43.77704131</th> <td>MT/month <th>43.77704131</th> </td>	43.77704131	MT/month <th>43.77704131</th>	43.77704131
Apr	2007	Unit 02 - Acid Plant <td>Sulfur Recovery <td>Carbon Dioxide <th>3826.802931</th> <td>% <td>100</td> <td>% <td>Fluoride (68 + STPConv) / (68 + STPConv) <th>3897.191165</th> <td>meq</td> <td>meq <td>100</td> <td>meq <th>41.40704607</th> <td>MT/month <th>41.40704607</th> </td></td></td></td></td></td></td></td>	Sulfur Recovery <td>Carbon Dioxide <th>3826.802931</th> <td>% <td>100</td> <td>% <td>Fluoride (68 + STPConv) / (68 + STPConv) <th>3897.191165</th> <td>meq</td> <td>meq <td>100</td> <td>meq <th>41.40704607</th> <td>MT/month <th>41.40704607</th> </td></td></td></td></td></td></td>	Carbon Dioxide <th>3826.802931</th> <td>% <td>100</td> <td>% <td>Fluoride (68 + STPConv) / (68 + STPConv) <th>3897.191165</th> <td>meq</td> <td>meq <td>100</td> <td>meq <th>41.40704607</th> <td>MT/month <th>41.40704607</th> </td></td></td></td></td></td>	3826.802931	% <td>100</td> <td>% <td>Fluoride (68 + STPConv) / (68 + STPConv) <th>3897.191165</th> <td>meq</td> <td>meq <td>100</td> <td>meq <th>41.40704607</th> <td>MT/month <th>41.40704607</th> </td></td></td></td></td>	100	% <td>Fluoride (68 + STPConv) / (68 + STPConv) <th>3897.191165</th> <td>meq</td> <td>meq <td>100</td> <td>meq <th>41.40704607</th> <td>MT/month <th>41.40704607</th> </td></td></td></td>	Fluoride (68 + STPConv) / (68 + STPConv) <th>3897.191165</th> <td>meq</td> <td>meq <td>100</td> <td>meq <th>41.40704607</th> <td>MT/month <th>41.40704607</th> </td></td></td>	3897.191165	meq	meq <td>100</td> <td>meq <th>41.40704607</th> <td>MT/month <th>41.40704607</th> </td></td>	100	meq <th>41.40704607</th> <td>MT/month <th>41.40704607</th> </td>	41.40704607	MT/month <th>41.40704607</th>	41.40704607
May	2007	Unit 02 - Acid Plant <td>Sulfur Recovery <td>Carbon Dioxide <th>3438.423843</th> <td>% <td>100</td> <td>% <td>Fluoride (68 + STPConv) / (68 + STPConv) <th>3487.306182</th> <td>meq</td> <td>meq <td>100</td> <td>meq <th>36.18707972</th> <td>MT/month <th>36.18707972</th> </td></td></td></td></td></td></td></td>	Sulfur Recovery <td>Carbon Dioxide <th>3438.423843</th> <td>% <td>100</td> <td>% <td>Fluoride (68 + STPConv) / (68 + STPConv) <th>3487.306182</th> <td>meq</td> <td>meq <td>100</td> <td>meq <th>36.18707972</th> <td>MT/month <th>36.18707972</th> </td></td></td></td></td></td></td>	Carbon Dioxide <th>3438.423843</th> <td>% <td>100</td> <td>% <td>Fluoride (68 + STPConv) / (68 + STPConv) <th>3487.306182</th> <td>meq</td> <td>meq <td>100</td> <td>meq <th>36.18707972</th> <td>MT/month <th>36.18707972</th> </td></td></td></td></td></td>	3438.423843	% <td>100</td> <td>% <td>Fluoride (68 + STPConv) / (68 + STPConv) <th>3487.306182</th> <td>meq</td> <td>meq <td>100</td> <td>meq <th>36.18707972</th> <td>MT/month <th>36.18707972</th> </td></td></td></td></td>	100	% <td>Fluoride (68 + STPConv) / (68 + STPConv) <th>3487.306182</th> <td>meq</td> <td>meq <td>100</td> <td>meq <th>36.18707972</th> <td>MT/month <th>36.18707972</th> </td></td></td></td>	Fluoride (68 + STPConv) / (68 + STPConv) <th>3487.306182</th> <td>meq</td> <td>meq <td>100</td> <td>meq <th>36.18707972</th> <td>MT/month <th>36.18707972</th> </td></td></td>	3487.306182	meq	meq <td>100</td> <td>meq <th>36.18707972</th> <td>MT/month <th>36.18707972</th> </td></td>	100	meq <th>36.18707972</th> <td>MT/month <th>36.18707972</th> </td>	36.18707972	MT/month <th>36.18707972</th>	36.18707972
Jun	2007	Unit 02 - Acid Plant <td>Sulfur Recovery <td>Carbon Dioxide <th>4215.932554</th> <td>% <td>100</td> <td>% <td>Fluoride (68 + STPConv) / (68 + STPConv) <th>4289.532327</th> <td>meq</td> <td>meq <td>100</td> <td>meq <th>44.34219265</th> <td>MT/month <th>44.34219265</th> </td></td></td></td></td></td></td></td>	Sulfur Recovery <td>Carbon Dioxide <th>4215.932554</th> <td>% <td>100</td> <td>% <td>Fluoride (68 + STPConv) / (68 + STPConv) <th>4289.532327</th> <td>meq</td> <td>meq <td>100</td> <td>meq <th>44.34219265</th> <td>MT/month <th>44.34219265</th> </td></td></td></td></td></td></td>	Carbon Dioxide <th>4215.932554</th> <td>% <td>100</td> <td>% <td>Fluoride (68 + STPConv) / (68 + STPConv) <th>4289.532327</th> <td>meq</td> <td>meq <td>100</td> <td>meq <th>44.34219265</th> <td>MT/month <th>44.34219265</th> </td></td></td></td></td></td>	4215.932554	% <td>100</td> <td>% <td>Fluoride (68 + STPConv) / (68 + STPConv) <th>4289.532327</th> <td>meq</td> <td>meq <td>100</td> <td>meq <th>44.34219265</th> <td>MT/month <th>44.34219265</th> </td></td></td></td></td>	100	% <td>Fluoride (68 + STPConv) / (68 + STPConv) <th>4289.532327</th> <td>meq</td> <td>meq <td>100</td> <td>meq <th>44.34219265</th> <td>MT/month <th>44.34219265</th> </td></td></td></td>	Fluoride (68 + STPConv) / (68 + STPConv) <th>4289.532327</th> <td>meq</td> <td>meq <td>100</td> <td>meq <th>44.34219265</th> <td>MT/month <th>44.34219265</th> </td></td></td>	4289.532327	meq	meq <td>100</td> <td>meq <th>44.34219265</th> <td>MT/month <th>44.34219265</th> </td></td>	100	meq <th>44.34219265</th> <td>MT/month <th>44.34219265</th> </td>	44.34219265	MT/month <th>44.34219265</th>	44.34219265
Jul	2007	Unit 02 - Acid Plant <td>Sulfur Recovery <td>Carbon Dioxide <th>5344.77721</th> <td>% <td>100</td> <td>% <td>Fluoride (68 + STPConv) / (68 + STPConv) <th>5427.897128</th> <td>meq</td> <td>meq <td>100</td> <td>meq <th>56.21972525</th> <td>MT/month <th>56.21972525</th> </td></td></td></td></td></td></td></td>	Sulfur Recovery <td>Carbon Dioxide <th>5344.77721</th> <td>% <td>100</td> <td>% <td>Fluoride (68 + STPConv) / (68 + STPConv) <th>5427.897128</th> <td>meq</td> <td>meq <td>100</td> <td>meq <th>56.21972525</th> <td>MT/month <th>56.21972525</th> </td></td></td></td></td></td></td>	Carbon Dioxide <th>5344.77721</th> <td>% <td>100</td> <td>% <td>Fluoride (68 + STPConv) / (68 + STPConv) <th>5427.897128</th> <td>meq</td> <td>meq <td>100</td> <td>meq <th>56.21972525</th> <td>MT/month <th>56.21972525</th> </td></td></td></td></td></td>	5344.77721	% <td>100</td> <td>% <td>Fluoride (68 + STPConv) / (68 + STPConv) <th>5427.897128</th> <td>meq</td> <td>meq <td>100</td> <td>meq <th>56.21972525</th> <td>MT/month <th>56.21972525</th> </td></td></td></td></td>	100	% <td>Fluoride (68 + STPConv) / (68 + STPConv) <th>5427.897128</th> <td>meq</td> <td>meq <td>100</td> <td>meq <th>56.21972525</th> <td>MT/month <th>56.21972525</th> </td></td></td></td>	Fluoride (68 + STPConv) / (68 + STPConv) <th>5427.897128</th> <td>meq</td> <td>meq <td>100</td> <td>meq <th>56.21972525</th> <td>MT/month <th>56.21972525</th> </td></td></td>	5427.897128	meq	meq <td>100</td> <td>meq <th>56.21972525</th> <td>MT/month <th>56.21972525</th> </td></td>	100	meq <th>56.21972525</th> <td>MT/month <th>56.21972525</th> </td>	56.21972525	MT/month <th>56.21972525</th>	56.21972525
Aug	2007	Unit 02 - Acid Plant <td>Sulfur Recovery <td>Carbon Dioxide <th>4374.811208</th> <td>% <td>100</td> <td>% <td>Fluoride (68 + STPConv) / (68 + STPConv) <th>4442.229831</th> <td>meq</td> <td>meq <td>100</td> <td>meq <th>46.01721153</th> <td>MT/month <th>46.01721153</th> </td></td></td></td></td></td></td></td>	Sulfur Recovery <td>Carbon Dioxide <th>4374.811208</th> <td>% <td>100</td> <td>% <td>Fluoride (68 + STPConv) / (68 + STPConv) <th>4442.229831</th> <td>meq</td> <td>meq <td>100</td> <td>meq <th>46.01721153</th> <td>MT/month <th>46.01721153</th> </td></td></td></td></td></td></td>	Carbon Dioxide <th>4374.811208</th> <td>% <td>100</td> <td>% <td>Fluoride (68 + STPConv) / (68 + STPConv) <th>4442.229831</th> <td>meq</td> <td>meq <td>100</td> <td>meq <th>46.01721153</th> <td>MT/month <th>46.01721153</th> </td></td></td></td></td></td>	4374.811208	% <td>100</td> <td>% <td>Fluoride (68 + STPConv) / (68 + STPConv) <th>4442.229831</th> <td>meq</td> <td>meq <td>100</td> <td>meq <th>46.01721153</th> <td>MT/month <th>46.01721153</th> </td></td></td></td></td>	100	% <td>Fluoride (68 + STPConv) / (68 + STPConv) <th>4442.229831</th> <td>meq</td> <td>meq <td>100</td> <td>meq <th>46.01721153</th> <td>MT/month <th>46.01721153</th> </td></td></td></td>	Fluoride (68 + STPConv) / (68 + STPConv) <th>4442.229831</th> <td>meq</td> <td>meq <td>100</td> <td>meq <th>46.01721153</th> <td>MT/month <th>46.01721153</th> </td></td></td>	4442.229831	meq	meq <td>100</td> <td>meq <th>46.01721153</th> <td>MT/month <th>46.01721153</th> </td></td>	100	meq <th>46.01721153</th> <td>MT/month <th>46.01721153</th> </td>	46.01721153	MT/month <th>46.01721153</th>	46.01721153
Sep	2007	Unit 02 - Acid Plant <td>Sulfur Recovery <td>Carbon Dioxide <th>5315.484509</th> <td>% <td>100</td> <td>% <td>Fluoride (68 + STPConv) / (68 + STPConv) <th>5387.288549</th> <td>meq</td> <td>meq <td>100</td> <td>meq <th>56.87753394</th> <td>MT/month <th>56.87753394</th> </td></td></td></td></td></td></td></td>	Sulfur Recovery <td>Carbon Dioxide <th>5315.484509</th> <td>% <td>100</td> <td>% <td>Fluoride (68 + STPConv) / (68 + STPConv) <th>5387.288549</th> <td>meq</td> <td>meq <td>100</td> <td>meq <th>56.87753394</th> <td>MT/month <th>56.87753394</th> </td></td></td></td></td></td></td>	Carbon Dioxide <th>5315.484509</th> <td>% <td>100</td> <td>% <td>Fluoride (68 + STPConv) / (68 + STPConv) <th>5387.288549</th> <td>meq</td> <td>meq <td>100</td> <td>meq <th>56.87753394</th> <td>MT/month <th>56.87753394</th> </td></td></td></td></td></td>	5315.484509	% <td>100</td> <td>% <td>Fluoride (68 + STPConv) / (68 + STPConv) <th>5387.288549</th> <td>meq</td> <td>meq <td>100</td> <td>meq <th>56.87753394</th> <td>MT/month <th>56.87753394</th> </td></td></td></td></td>	100	% <td>Fluoride (68 + STPConv) / (68 + STPConv) <th>5387.288549</th> <td>meq</td> <td>meq <td>100</td> <td>meq <th>56.87753394</th> <td>MT/month <th>56.87753394</th> </td></td></td></td>	Fluoride (68 + STPConv) / (68 + STPConv) <th>5387.288549</th> <td>meq</td> <td>meq <td>100</td> <td>meq <th>56.87753394</th> <td>MT/month <th>56.87753394</th> </td></td></td>	5387.288549	meq	meq <td>100</td> <td>meq <th>56.87753394</th> <td>MT/month <th>56.87753394</th> </td></td>	100	meq <th>56.87753394</th> <td>MT/month <th>56.87753394</th> </td>	56.87753394	MT/month <th>56.87753394</th>	56.87753394
Oct	2007	Unit 02 - Acid Plant <td>Sulfur Recovery <td>Carbon Dioxide <th>5815.225683</th> <td>% <td>100</td> <td>% <td>Fluoride (68 + STPConv) / (68 + STPConv) <th>5905.052158</th> <td>meq</td> <td>meq <td>100</td> <td>meq <th>61.17064625</th> <td>MT/month <th>61.17064625</th> </td></td></td></td></td></td></td></td>	Sulfur Recovery <td>Carbon Dioxide <th>5815.225683</th> <td>% <td>100</td> <td>% <td>Fluoride (68 + STPConv) / (68 + STPConv) <th>5905.052158</th> <td>meq</td> <td>meq <td>100</td> <td>meq <th>61.17064625</th> <td>MT/month <th>61.17064625</th> </td></td></td></td></td></td></td>	Carbon Dioxide <th>5815.225683</th> <td>% <td>100</td> <td>% <td>Fluoride (68 + STPConv) / (68 + STPConv) <th>5905.052158</th> <td>meq</td> <td>meq <td>100</td> <td>meq <th>61.17064625</th> <td>MT/month <th>61.17064625</th> </td></td></td></td></td></td>	5815.225683	% <td>100</td> <td>% <td>Fluoride (68 + STPConv) / (68 + STPConv) <th>5905.052158</th> <td>meq</td> <td>meq <td>100</td> <td>meq <th>61.17064625</th> <td>MT/month <th>61.17064625</th> </td></td></td></td></td>	100	% <td>Fluoride (68 + STPConv) / (68 + STPConv) <th>5905.052158</th> <td>meq</td> <td>meq <td>100</td> <td>meq <th>61.17064625</th> <td>MT/month <th>61.17064625</th> </td></td></td></td>	Fluoride (68 + STPConv) / (68 + STPConv) <th>5905.052158</th> <td>meq</td> <td>meq <td>100</td> <td>meq <th>61.17064625</th> <td>MT/month <th>61.17064625</th> </td></td></td>	5905.052158	meq	meq <td>100</td> <td>meq <th>61.17064625</th> <td>MT/month <th>61.17064625</th> </td></td>	100	meq <th>61.17064625</th> <td>MT/month <th>61.17064625</th> </td>	61.17064625	MT/month <th>61.17064625</th>	61.17064625
Nov	2007	Unit 02 - Acid Plant <td>Sulfur Recovery <td>Carbon Dioxide <th>5407.277925</th> <td>% <td>100</td> <td>% <td>Fluoride (68 + STPConv) / (68 + STPConv) <th>5485.821022</th> <td>meq</td> <td>meq <td>100</td> <td>meq <th>58.87753394</th> <td>MT/month <th>58.87753394</th> </td></td></td></td></td></td></td></td>	Sulfur Recovery <td>Carbon Dioxide <th>5407.277925</th> <td>% <td>100</td> <td>% <td>Fluoride (68 + STPConv) / (68 + STPConv) <th>5485.821022</th> <td>meq</td> <td>meq <td>100</td> <td>meq <th>58.87753394</th> <td>MT/month <th>58.87753394</th> </td></td></td></td></td></td></td>	Carbon Dioxide <th>5407.277925</th> <td>% <td>100</td> <td>% <td>Fluoride (68 + STPConv) / (68 + STPConv) <th>5485.821022</th> <td>meq</td> <td>meq <td>100</td> <td>meq <th>58.87753394</th> <td>MT/month <th>58.87753394</th> </td></td></td></td></td></td>	5407.277925	% <td>100</td> <td>% <td>Fluoride (68 + STPConv) / (68 + STPConv) <th>5485.821022</th> <td>meq</td> <td>meq <td>100</td> <td>meq <th>58.87753394</th> <td>MT/month <th>58.87753394</th> </td></td></td></td></td>	100	% <td>Fluoride (68 + STPConv) / (68 + STPConv) <th>5485.821022</th> <td>meq</td> <td>meq <td>100</td> <td>meq <th>58.87753394</th> <td>MT/month <th>58.87753394</th> </td></td></td></td>	Fluoride (68 + STPConv) / (68 + STPConv) <th>5485.821022</th> <td>meq</td> <td>meq <td>100</td> <td>meq <th>58.87753394</th> <td>MT/month <th>58.87753394</th> </td></td></td>	5485.821022	meq	meq <td>100</td> <td>meq <th>58.87753394</th> <td>MT/month <th>58.87753394</th> </td></td>	100	meq <th>58.87753394</th> <td>MT/month <th>58.87753394</th> </td>	58.87753394	MT/month <th>58.87753394</th>	58.87753394
Dec	2007	Unit 02 - Acid Plant <td>Sulfur Recovery <td>Carbon Dioxide <th>4304.388442</th> <td>% <td>100</td> <td>% <td>Fluoride (68 + STPConv) / (68 + STPConv) <th>4370.828988</th> <td>meq</td> <td>meq <td>100</td> <td>meq <th>45.21500687</th> <td>MT/month <th>45.21500687</th> </td></td></td></td></td></td></td></td>	Sulfur Recovery <td>Carbon Dioxide <th>4304.388442</th> <td>% <td>100</td> <td>% <td>Fluoride (68 + STPConv) / (68 + STPConv) <th>4370.828988</th> <td>meq</td> <td>meq <td>100</td> <td>meq <th>45.21500687</th> <td>MT/month <th>45.21500687</th> </td></td></td></td></td></td></td>	Carbon Dioxide <th>4304.388442</th> <td>% <td>100</td> <td>% <td>Fluoride (68 + STPConv) / (68 + STPConv) <th>4370.828988</th> <td>meq</td> <td>meq <td>100</td> <td>meq <th>45.21500687</th> <td>MT/month <th>45.21500687</th> </td></td></td></td></td></td>	4304.388442	% <td>100</td> <td>% <td>Fluoride (68 + STPConv) / (68 + STPConv) <th>4370.828988</th> <td>meq</td> <td>meq <td>100</td> <td>meq <th>45.21500687</th> <td>MT/month <th>45.21500687</th> </td></td></td></td></td>	100	% <td>Fluoride (68 + STPConv) / (68 + STPConv) <th>4370.828988</th> <td>meq</td> <td>meq <td>100</td> <td>meq <th>45.21500687</th> <td>MT/month <th>45.21500687</th> </td></td></td></td>	Fluoride (68 + STPConv) / (68 + STPConv) <th>4370.828988</th> <td>meq</td> <td>meq <td>100</td> <td>meq <th>45.21500687</th> <td>MT/month <th>45.21500687</th> </td></td></td>	4370.828988	meq	meq <td>100</td> <td>meq <th>45.21500687</th> <td>MT/month <th>45.21500687</th> </td></td>	100	meq <th>45.21500687</th> <td>MT/month <th>45.21500687</th> </td>	45.21500687	MT/month <th>45.21500687</th>	45.21500687
Jan	2008	Unit 02 - Acid Plant <td>Sulfur Recovery <td>Carbon Dioxide <th>3848.405682</th> <td>% <td>100</td> <td>% <td>Fluoride (68 + STPConv) / (68 + STPConv) <th>3704.6819</th> <td>meq</td> <td>meq <td>100</td> <td>meq <th>38.37972127</th> <td>MT/month <th>38.37972127</th> </td></td></td></td></td></td></td></td>	Sulfur Recovery <td>Carbon Dioxide <th>3848.405682</th> <td>% <td>100</td> <td>% <td>Fluoride (68 + STPConv) / (68 + STPConv) <th>3704.6819</th> <td>meq</td> <td>meq <td>100</td> <td>meq <th>38.37972127</th> <td>MT/month <th>38.37972127</th> </td></td></td></td></td></td></td>	Carbon Dioxide <th>3848.405682</th> <td>% <td>100</td> <td>% <td>Fluoride (68 + STPConv) / (68 + STPConv) <th>3704.6819</th> <td>meq</td> <td>meq <td>100</td> <td>meq <th>38.37972127</th> <td>MT/month <th>38.37972127</th> </td></td></td></td></td></td>	3848.405682	% <td>100</td> <td>% <td>Fluoride (68 + STPConv) / (68 + STPConv) <th>3704.6819</th> <td>meq</td> <td>meq <td>100</td> <td>meq <th>38.37972127</th> <td>MT/month <th>38.37972127</th> </td></td></td></td></td>	100	% <td>Fluoride (68 + STPConv) / (68 + STPConv) <th>3704.6819</th> <td>meq</td> <td>meq <td>100</td> <td>meq <th>38.37972127</th> <td>MT/month <th>38.37972127</th> </td></td></td></td>	Fluoride (68 + STPConv) / (68 + STPConv) <th>3704.6819</th> <td>meq</td> <td>meq <td>100</td> <td>meq <th>38.37972127</th> <td>MT/month <th>38.37972127</th> </td></td></td>	3704.6819	meq	meq <td>100</td> <td>meq <th>38.37972127</th> <td>MT/month <th>38.37972127</th> </td></td>	100	meq <th>38.37972127</th> <td>MT/month <th>38.37972127</th> </td>	38.37972127	MT/month <th>38.37972127</th>	38.37972127
Feb	2008	Unit 02 - Acid Plant <td>Sulfur Recovery <td>Carbon Dioxide <th>4818.241315</th> <td>% <td>100</td> <td>% <td>Fluoride (68 + STPConv) / (68 + STPConv) <th>4885.071403</th> <td>meq</td> <td>meq <td>100</td> <td>meq <th>51.7441812</th> <td>MT/month <th>51.7441812</th> </td></td></td></td></td></td></td></td>	Sulfur Recovery <td>Carbon Dioxide <th>4818.241315</th> <td>% <td>100</td> <td>% <td>Fluoride (68 + STPConv) / (68 + STPConv) <th>4885.071403</th> <td>meq</td> <td>meq <td>100</td> <td>meq <th>51.7441812</th> <td>MT/month <th>51.7441812</th> </td></td></td></td></td></td></td>	Carbon Dioxide <th>4818.241315</th> <td>% <td>100</td> <td>% <td>Fluoride (68 + STPConv) / (68 + STPConv) <th>4885.071403</th> <td>meq</td> <td>meq <td>100</td> <td>meq <th>51.7441812</th> <td>MT/month <th>51.7441812</th> </td></td></td></td></td></td>	4818.241315	% <td>100</td> <td>% <td>Fluoride (68 + STPConv) / (68 + STPConv) <th>4885.071403</th> <td>meq</td> <td>meq <td>100</td> <td>meq <th>51.7441812</th> <td>MT/month <th>51.7441812</th> </td></td></td></td></td>	100	% <td>Fluoride (68 + STPConv) / (68 + STPConv) <th>4885.071403</th> <td>meq</td> <td>meq <td>100</td> <td>meq <th>51.7441812</th> <td>MT/month <th>51.7441812</th> </td></td></td></td>	Fluoride (68 + STPConv) / (68 + STPConv) <th>4885.071403</th> <td>meq</td> <td>meq <td>100</td> <td>meq <th>51.7441812</th> <td>MT/month <th>51.7441812</th> </td></td></td>	4885.071403	meq	meq <td>100</td> <td>meq <th>51.7441812</th> <td>MT/month <th>51.7441812</th> </td></td>	100	meq <th>51.7441812</th> <td>MT/month <th>51.7441812</th> </td>	51.7441812	MT/month <th>51.7441812</th>	51.7441812
Mar	2008	Unit 02 - Acid Plant <td>Sulfur Recovery <td>Carbon Dioxide <th>3797.383994</th> <td>% <td>100</td> <td>% <td>Fluoride (68 + STPConv) / (68 + STPConv) <th>3802.352218</th> <td>meq</td> <td>meq <td>100</td> <td>meq <th>39.21977578</th> <td>MT/month <th>39.21977578</th> </td></td></td></td></td></td></td></td>	Sulfur Recovery <td>Carbon Dioxide <th>3797.383994</th> <td>% <td>100</td> <td>% <td>Fluoride (68 + STPConv) / (68 + STPConv) <th>3802.352218</th> <td>meq</td> <td>meq <td>100</td> <td>meq <th>39.21977578</th> <td>MT/month <th>39.21977578</th> </td></td></td></td></td></td></td>	Carbon Dioxide <th>3797.383994</th> <td>% <td>100</td> <td>% <td>Fluoride (68 + STPConv) / (68 + STPConv) <th>3802.352218</th> <td>meq</td> <td>meq <td>100</td> <td>meq <th>39.21977578</th> <td>MT/month <th>39.21977578</th> </td></td></td></td></td></td>	3797.383994	% <td>100</td> <td>% <td>Fluoride (68 + STPConv) / (68 + STPConv) <th>3802.352218</th> <td>meq</td> <td>meq <td>100</td> <td>meq <th>39.21977578</th> <td>MT/month <th>39.21977578</th> </td></td></td></td></td>	100	% <td>Fluoride (68 + STPConv) / (68 + STPConv) <th>3802.352218</th> <td>meq</td> <td>meq <td>100</td> <td>meq <th>39.21977578</th> <td>MT/month <th>39.21977578</th> </td></td></td></td>	Fluoride (68 + STPConv) / (68 + STPConv) <th>3802.352218</th> <td>meq</td> <td>meq <td>100</td> <td>meq <th>39.21977578</th> <td>MT/month <th>39.21977578</th> </td></td></td>	3802.352218	meq	meq <td>100</td> <td>meq <th>39.21977578</th> <td>MT/month <th>39.21977578</th> </td></td>	100	meq <th>39.21977578</th> <td>MT/month <th>39.21977578</th> </td>	39.21977578	MT/month <th>39.21977578</th>	39.21977578
Apr	2008	Unit 02 - Acid Plant <td>Sulfur Recovery <td>Carbon Dioxide <th>3848.801377</th> <td>% <td>100</td> <td>% <td>Fluoride (68 + STPConv) / (68 + STPConv) <th>4007.55884</th> <td>meq</td> <td>meq <td>100</td> <td>meq <th>41.51445165</th> <td>MT/month <th>41.51445165</th> </td></td></td></td></td></td></td></td>	Sulfur Recovery <td>Carbon Dioxide <th>3848.801377</th> <td>% <td>100</td> <td>% <td>Fluoride (68 + STPConv) / (68 + STPConv) <th>4007.55884</th> <td>meq</td> <td>meq <td>100</td> <td>meq <th>41.51445165</th> <td>MT/month <th>41.51445165</th> </td></td></td></td></td></td></td>	Carbon Dioxide <th>3848.801377</th> <td>% <td>100</td> <td>% <td>Fluoride (68 + STPConv) / (68 + STPConv) <th>4007.55884</th> <td>meq</td> <td>meq <td>100</td> <td>meq <th>41.51445165</th> <td>MT/month <th>41.51445165</th> </td></td></td></td></td></td>	3848.801377	% <td>100</td> <td>% <td>Fluoride (68 + STPConv) / (68 + STPConv) <th>4007.55884</th> <td>meq</td> <td>meq <td>100</td> <td>meq <th>41.51445165</th> <td>MT/month <th>41.51445165</th> </td></td></td></td></td>	100	% <td>Fluoride (68 + STPConv) / (68 + STPConv) <th>4007.55884</th> <td>meq</td> <td>meq <td>100</td> <td>meq <th>41.51445165</th> <td>MT/month <th>41.51445165</th> </td></td></td></td>	Fluoride (68 + STPConv) / (68 + STPConv) <th>4007.55884</th> <td>meq</td> <td>meq <td>100</td> <td>meq <th>41.51445165</th> <td>MT/month <th>41.51445165</th> </td></td></td>	4007.55884	meq	meq <td>100</td> <td>meq <th>41.51445165</th> <td>MT/month <th>41.51445165</th> </td></td>	100	meq <th>41.51445165</th> <td>MT/month <th>41.51445165</th> </td>	41.51445165	MT/month <th>41.51445165</th>	41.51445165
May	2008	Unit 02 - Acid Plant <td>Sulfur Recovery <td>Carbon Dioxide <th>4071.278028</th> <td>% <td>100</td> <td>% <td>Fluoride (68 + STPConv) / (68 + STPConv) <th>4133.845212</th> <td>meq</td> <td>meq <td>100</td> <td>meq <th>42.82362011</th> <td>MT/month <th>42.82362011</th> </td></td></td></td></td></td></td></td>	Sulfur Recovery <td>Carbon Dioxide <th>4071.278028</th> <td>% <td>100</td> <td>% <td>Fluoride (68 + STPConv) / (68 + STPConv) <th>4133.845212</th> <td>meq</td> <td>meq <td>100</td> <td>meq <th>42.82362011</th> <td>MT/month <th>42.82362011</th> </td></td></td></td></td></td></td>	Carbon Dioxide <th>4071.278028</th> <td>% <td>100</td> <td>% <td>Fluoride (68 + STPConv) / (68 + STPConv) <th>4133.845212</th> <td>meq</td> <td>meq <td>100</td> <td>meq <th>42.82362011</th> <td>MT/month <th>42.82362011</th> </td></td></td></td></td></td>	4071.278028	% <td>100</td> <td>% <td>Fluoride (68 + STPConv) / (68 + STPConv) <th>4133.845212</th> <td>meq</td> <td>meq <td>100</td> <td>meq <th>42.82362011</th> <td>MT/month <th>42.82362011</th> </td></td></td></td></td>	100	% <td>Fluoride (68 + STPConv) / (68 + STPConv) <th>4133.845212</th> <td>meq</td> <td>meq <td>100</td> <td>meq <th>42.82362011</th> <td>MT/month <th>42.82362011</th> </td></td></td></td>	Fluoride (68 + STPConv) / (68 + STPConv) <th>4133.845212</th> <td>meq</td> <td>meq <td>100</td> <td>meq <th>42.82362011</th> <td>MT/month <th>42.82362011</th> </td></td></td>	4133.845212	meq	meq <td>100</td> <td>meq <th>42.82362011</th> <td>MT/month <th>42.82362011</th> </td></td>	100	meq <th>42.82362011</th> <td>MT/month <th>42.82362011</th> </td>	42.82362011	MT/month <th>42.82362011</th>	42.82362011
Jun	2008	Unit 02 - Acid Plant <td>Sulfur Recovery <td>Carbon Dioxide <th>2918.887978</th> <td>% <td>100</td> <td>% <td>Fluoride (68 + STPConv) / (68 + STPConv) <th>2981.77128</th> <td>meq</td> <td>meq <td>100</td> <td>meq <th>30.68109154</th> <td>MT/month <th>30.68109154</th> </td></td></td></td></td></td></td></td>	Sulfur Recovery <td>Carbon Dioxide <th>2918.887978</th> <td>% <td>100</td> <td>% <td>Fluoride (68 + STPConv) / (68 + STPConv) <th>2981.77128</th> <td>meq</td> <td>meq <td>100</td> <td>meq <th>30.68109154</th> <td>MT/month <th>30.68109154</th> </td></td></td></td></td></td></td>	Carbon Dioxide <th>2918.887978</th> <td>% <td>100</td> <td>% <td>Fluoride (68 + STPConv) / (68 + STPConv) <th>2981.77128</th> <td>meq</td> <td>meq <td>100</td> <td>meq <th>30.68109154</th> <td>MT/month <th>30.68109154</th> </td></td></td></td></td></td>	2918.887978	% <td>100</td> <td>% <td>Fluoride (68 + STPConv) / (68 + STPConv) <th>2981.77128</th> <td>meq</td> <td>meq <td>100</td> <td>meq <th>30.68109154</th> <td>MT/month <th>30.68109154</th> </td></td></td></td></td>	100	% <td>Fluoride (68 + STPConv) / (68 + STPConv) <th>2981.77128</th> <td>meq</td> <td>meq <td>100</td> <td>meq <th>30.68109154</th> <td>MT/month <th>30.68109154</th> </td></td></td></td>	Fluoride (68 + STPConv) / (68 + STPConv) <th>2981.77128</th> <td>meq</td> <td>meq <td>100</td> <td>meq <th>30.68109154</th> <td>MT/month <th>30.68109154</th> </td></td></td>	2981.77128	meq	meq <td>100</td> <td>meq <th>30.68109154</th> <td>MT/month <th>30.68109154</th> </td></td>	100	meq <th>30.68109154</th> <td>MT/month <th>30.68109154</th> </td>	30.68109154	MT/month <th>30.68109154</th>	30.68109154
Jul	2008	Unit 02 - Acid Plant <td>Sulfur Recovery <td>Carbon Dioxide <th>3218.578183</th> <td>% <td>100</td> <td>% <td>Fluoride (68 + STPConv) / (68 + STPConv) <th>3288.812409</th> <td>meq</td> <td>meq <td>100</td> <td>meq <th>34.8916218</th> <td>MT/month <th>34.8916218</th> </td></td></td></td></td></td></td></td>	Sulfur Recovery <td>Carbon Dioxide <th>3218.578183</th> <td>% <td>100</td> <td>% <td>Fluoride (68 + STPConv) / (68 + STPConv) <th>3288.812409</th> <td>meq</td> <td>meq <td>100</td> <td>meq <th>34.8916218</th> <td>MT/month <th>34.8916218</th> </td></td></td></td></td></td></td>	Carbon Dioxide <th>3218.578183</th> <td>% <td>100</td> <td>% <td>Fluoride (68 + STPConv) / (68 + STPConv) <th>3288.812409</th> <td>meq</td> <td>meq <td>100</td> <td>meq <th>34.8916218</th> <td>MT/month <th>34.8916218</th> </td></td></td></td></td></td>	3218.578183	% <td>100</td> <td>% <td>Fluoride (68 + STPConv) / (68 + STPConv) <th>3288.812409</th> <td>meq</td> <td>meq <td>100</td> <td>meq <th>34.8916218</th> <td>MT/month <th>34.8916218</th> </td></td></td></td></td>	100	% <td>Fluoride (68 + STPConv) / (68 + STPConv) <th>3288.812409</th> <td>meq</td> <td>meq <td>100</td> <td>meq <th>34.8916218</th> <td>MT/month <th>34.8916218</th> </td></td></td></td>	Fluoride (68 + STPConv) / (68 + STPConv) <th>3288.812409</th> <td>meq</td> <td>meq <td>100</td> <td>meq <th>34.8916218</th> <td>MT/month <th>34.8916218</th> </td></td></td>	3288.812409	meq	meq <td>100</td> <td>meq <th>34.8916218</th> <td>MT/month <th>34.8916218</th> </td></td>	100	meq <th>34.8916218</th> <td>MT/month <th>34.8916218</th> </td>	34.8916218	MT/month <th>34.8916218</th>	34.8916218
Aug	2008	Unit 02 - Acid Plant <td>Sulfur Recovery <td>Carbon Dioxide <th>4518.262638</th> <td>% <td>100</td> <td>% <td>Fluoride (68 + STPConv) / (68 + STPConv) <th>4587.817164</th> <td>meq</td> <td>meq <td>100</td> <td>meq <th>47.52638984</th> <td>MT/month <th>47.52638984</th> </td></td></td></td></td></td></td></td>	Sulfur Recovery <td>Carbon Dioxide <th>4518.262638</th> <td>% <td>100</td> <td>% <td>Fluoride (68 + STPConv) / (68 + STPConv) <th>4587.817164</th> <td>meq</td> <td>meq <td>100</td> <td>meq <th>47.52638984</th> <td>MT/month <th>47.52638984</th> </td></td></td></td></td></td></td>	Carbon Dioxide <th>4518.262638</th> <td>% <td>100</td> <td>% <td>Fluoride (68 + STPConv) / (68 + STPConv) <th>4587.817164</th> <td>meq</td> <td>meq <td>100</td> <td>meq <th>47.52638984</th> <td>MT/month <th>47.52638984</th> </td></td></td></td></td></td>	4518.262638	% <td>100</td> <td>% <td>Fluoride (68 + STPConv) / (68 + STPConv) <th>4587.817164</th> <td>meq</td> <td>meq <td>100</td> <td>meq <th>47.52638984</th> <td>MT/month <th>47.52638984</th> </td></td></td></td></td>	100	% <td>Fluoride (68 + STPConv) / (68 + STPConv) <th>4587.817164</th> <td>meq</td> <td>meq <td>100</td> <td>meq <th>47.52638984</th> <td>MT/month <th>47.52638984</th> </td></td></td></td>	Fluoride (68 + STPConv) / (68 + STPConv) <th>4587.817164</th> <td>meq</td> <td>meq <td>100</td> <td>meq <th>47.52638984</th> <td>MT/month <th>47.52638984</th> </td></td></td>	4587.817164	meq	meq <td>100</td> <td>meq <th>47.52638984</th> <td>MT/month <th>47.52638984</th> </td></td>	100	meq <th>47.52638984</th> <td>MT/month <th>47.52638984</th> </td>	47.52638984	MT/month <th>47.52638984</th>	47.52638984
Sep	2008	Unit 02 - Acid Plant <td>Sulfur Recovery <td>Carbon Dioxide <th>4287.332539</th> <td>% <td>100</td> <td>% <td>Fluoride (68 + STPConv) / (68 + STPConv) <th>4434.776828</th> <td>meq</td> <td>meq <td>100</td> <td>meq <th>45.83994294</th> <td>MT/month <th>45.83994294</th> </td></td></td></td></td></td></td></td>	Sulfur Recovery <td>Carbon Dioxide <th>4287.332539</th> <td>% <td>100</td> <td>% <td>Fluoride (68 + STPConv) / (68 + STPConv) <th>4434.776828</th> <td>meq</td> <td>meq <td>100</td> <td>meq <th>45.83994294</th> <td>MT/month <th>45.83994294</th> </td></td></td></td></td></td></td>	Carbon Dioxide <th>4287.332539</th> <td>% <td>100</td> <td>% <td>Fluoride (68 + STPConv) / (68 + STPConv) <th>4434.776828</th> <td>meq</td> <td>meq <td>100</td> <td>meq <th>45.83994294</th> <td>MT/month <th>45.83994294</th> </td></td></td></td></td></td>	4287.332539	% <td>100</td> <td>% <td>Fluoride (68 + STPConv) / (68 + STPConv) <th>4434.776828</th> <td>meq</td> <td>meq <td>100</td> <td>meq <th>45.83994294</th> <td>MT/month <th>45.83994294</th> </td></td></td></td></td>	100	% <td>Fluoride (68 + STPConv) / (68 + STPConv) <th>4434.776828</th> <td>meq</td> <td>meq <td>100</td> <td>meq <th>45.83994294</th> <td>MT/month <th>45.83994294</th> </td></td></td></td>	Fluoride (68 + STPConv) / (68 + STPConv) <th>4434.776828</th> <td>meq</td> <td>meq <td>100</td> <td>meq <th>45.83994294</th> <td>MT/month <th>45.83994294</th> </td></td></td>	4434.776828	meq	meq <td>100</td> <td>meq <th>45.83994294</th> <td>MT/month <th>45.83994294</th> </td></td>	100	meq <th>45.83994294</th> <td>MT/month <th>45.83994294</th> </td>	45.83994294	MT/month <th>45.83994294</th>	45.83994294
Oct	2008	Unit 02 - Acid Plant <td>Sulfur Recovery <td>Carbon Dioxide <th>2553.88584</th> <td>% <td>100</td> <td>% <td>Fluoride (68 + STPConv) / (68 + STPConv) <th>2608.595419</th> <td>meq</td> <td>meq <td>100</td> <td>meq <th>27.38156529</th> <td>MT/month <th>27.38156529</th> </td></td></td></td></td></td></td></td>	Sulfur Recovery <td>Carbon Dioxide <th>2553.88584</th> <td>% <td>100</td> <td>% <td>Fluoride (68 + STPConv) / (68 + STPConv) <th>2608.595419</th> <td>meq</td> <td>meq <td>100</td> <td>meq <th>27.38156529</th> <td>MT/month <th>27.38156529</th> </td></td></td></td></td></td></td>	Carbon Dioxide <th>2553.88584</th> <td>% <td>100</td> <td>% <td>Fluoride (68 + STPConv) / (68 + STPConv) <th>2608.595419</th> <td>meq</td> <td>meq <td>100</td> <td>meq <th>27.38156529</th> <td>MT/month <th>27.38156529</th> </td></td></td></td></td></td>	2553.88584	% <td>100</td> <td>% <td>Fluoride (68 + STPConv) / (68 + STPConv) <th>2608.595419</th> <td>meq</td> <td>meq <td>100</td> <td>meq <th>27.38156529</th> <td>MT/month <th>27.38156529</th> </td></td></td></td></td>	100	% <td>Fluoride (68 + STPConv) / (68 + STPConv) <th>2608.595419</th> <td>meq</td> <td>meq <td>100</td> <td>meq <th>27.38156529</th> <td>MT/month <th>27.38156529</th> </td></td></td></td>	Fluoride (68 + STPConv) / (68 + STPConv) <th>2608.595419</th> <td>meq</td> <td>meq <td>100</td> <td>meq <th>27.38156529</th> <td>MT/month <th>27.38156529</th> </td></td></td>	2608.595419	meq	meq <td>100</td> <td>meq <th>27.38156529</th> <td>MT/month <th>27.38156529</th> </td></td>	100	meq <th>27.38156529</th> <td>MT/month <th>27.38156529</th> </td>	27.38156529	MT/month <th>27.38156529</th>	27.38156529
Nov	2008	Unit 02 - Acid Plant <td>Sulfur Recovery <td>Carbon Dioxide <th>4815.727218</th> <td>% <td>100</td> <td>% <td>Fluoride (68 + STPConv) / (68 + STPConv) <th>4888.793815</th> <td>meq</td> <td>meq <td>100</td> <td>meq <th>48.5005878</th> <td>MT/month <th>48.5005878</th> </td></td></td></td></td></td></td></td>	Sulfur Recovery <td>Carbon Dioxide <th>4815.727218</th> <td>% <td>100</td> <td>% <td>Fluoride (68 + STPConv) / (68 + STPConv) <th>4888.793815</th> <td>meq</td> <td>meq <td>100</td> <td>meq <th>48.5005878</th> <td>MT/month <th>48.5005878</th> </td></td></td></td></td></td></td>	Carbon Dioxide <th>4815.727218</th> <td>% <td>100</td> <td>% <td>Fluoride (68 + STPConv) / (68 + STPConv) <th>4888.793815</th> <td>meq</td> <td>meq <td>100</td> <td>meq <th>48.5005878</th> <td>MT/month <th>48.5005878</th> </td></td></td></td></td></td>	4815.727218	% <td>100</td> <td>% <td>Fluoride (68 + STPConv) / (68 + STPConv) <th>4888.793815</th> <td>meq</td> <td>meq <td>100</td> <td>meq <th>48.5005878</th> <td>MT/month <th>48.5005878</th> </td></td></td></td></td>	100	% <td>Fluoride (68 + STPConv) / (68 + STPConv) <th>4888.793815</th> <td>meq</td> <td>meq <td>100</td> <td>meq <th>48.5005878</th> <td>MT/month <th>48.5005878</th> </td></td></td></td>	Fluoride (68 + STPConv) / (68 + STPConv) <th>4888.793815</th> <td>meq</td> <td>meq <td>100</td> <td>meq <th>48.5005878</th> <td>MT/month <th>48.5005878</th> </td></td></td>	4888.793815	meq	meq <td>100</td> <td>meq <th>48.5005878</th> <td>MT/month <th>48.5005878</th> </td></td>	100	meq <th>48.5005878</th> <td>MT/month <th>48.5005878</th> </td>	48.5005878	MT/month <th>48.5005878</th>	48.5005878
Dec	2008	Unit 02 - Acid Plant <td>Sulfur Recovery <td>Carbon Dioxide <th>5008.866275</th> <td>% <td>100</td> <td>% <td>Fluoride (68 + STPConv) / (68 + STPConv) <th>5086.079982</th> <td>meq</td> <td>meq <td>100</td> <td>meq <th>52.84883975</th> <td>MT/month <th>52.84883975</th> </td></td></td></td></td></td></td></td>	Sulfur Recovery <td>Carbon Dioxide <th>5008.866275</th> <td>% <td>100</td> <td>% <td>Fluoride (68 + STPConv) / (68 + STPConv) <th>5086.079982</th> <td>meq</td> <td>meq <td>100</td> <td>meq <th>52.84883975</th> <td>MT/month <th>52.84883975</th> </td></td></td></td></td></td></td>	Carbon Dioxide <th>5008.866275</th> <td>% <td>100</td> <td>% <td>Fluoride (68 + STPConv) / (68 + STPConv) <th>5086.079982</th> <td>meq</td> <td>meq <td>100</td> <td>meq <th>52.84883975</th> <td>MT/month <th>52.84883975</th> </td></td></td></td></td></td>	5008.866275	% <td>100</td> <td>% <td>Fluoride (68 + STPConv) / (68 + STPConv) <th>5086.079982</th> <td>meq</td> <td>meq <td>100</td> <td>meq <th>52.84883975</th> <td>MT/month <th>52.84883975</th> </td></td></td></td></td>	100	% <td>Fluoride (68 + STPConv) / (68 + STPConv) <th>5086.079982</th> <td>meq</td> <td>meq <td>100</td> <td>meq <th>52.84883975</th> <td>MT/month <th>52.84883975</th> </td></td></td></td>	Fluoride (68 + STPConv) / (68 + STPConv) <th>5086.079982</th> <td>meq</td> <td>meq <td>100</td> <td>meq <th>52.84883975</th> <td>MT/month <th>52.84883975</th> </td></td></td>	5086.079982	meq	meq <td>100</td> <td>meq <th>52.84883975</th> <td>MT/month <th>52.84883975</th> </td></td>	100	meq <th>52.84883975</th> <td>MT/month <th>52.84883975</th> </td>	52.84883975	MT/month <th>52.84883975</th>	52.84883975

Month	Year	Process Unit	Emission Scenario	GHG Species	Fuel Use (Liquid Volume) [FuelUsage]	Units	Heat Content (Liquid) - HHV [HHV]	Units	Species Emission Rate Expression	Species Emission Rate	Units	Converted Rate	Units	MT/Month CO2e	Comments
Jan	2010	WSR Combustion Sources	Stationary Comb	Carbon Dioxide	12708	bbi	4966	bbi	FuelUsage*HHV*EF*ConvLkg*ConvMmbtuMbu	9501667.965	lb/month	4309.889226	MT/month	4309.889226	
Jan	2010	WSR Combustion Sources	Stationary Comb	Methane	12708	bbi	4966	bbi	FuelUsage*HHV*EF*ConvLkg*ConvMmbtuMbu	419.0679793	lb/month	0.19006264	MT/month	4.7521566	
Jan	2010	WSR Combustion Sources	Stationary Comb	Nitrogen Oxide	12708	bbi	4966	bbi	FuelUsage*HHV*EF*ConvLkg*ConvMmbtuMbu	83.81359587	lb/month	0.038017253	MT/month	11.32914133	
Feb	2010	WSR Combustion Sources	Stationary Comb	Carbon Dioxide	9082	bbi	4958	bbi	FuelUsage*HHV*EF*ConvLkg*ConvMmbtuMbu	6752403.566	lb/month	3062.842379	MT/month	3062.842379	
Feb	2010	WSR Combustion Sources	Stationary Comb	Methane	9082	bbi	4958	bbi	FuelUsage*HHV*EF*ConvLkg*ConvMmbtuMbu	297.8125654	lb/month	0.13508568	MT/month	3.3771417	
Feb	2010	WSR Combustion Sources	Stationary Comb	Nitrogen Oxide	9082	bbi	4958	bbi	FuelUsage*HHV*EF*ConvLkg*ConvMmbtuMbu	59.56251308	lb/month	0.027017134	MT/month	8.051105813	
Mar	2010	WSR Combustion Sources	Stationary Comb	Carbon Dioxide	10228	bbi	4994	bbi	FuelUsage*HHV*EF*ConvLkg*ConvMmbtuMbu	7659662.39	lb/month	3474.368549	MT/month	3474.368549	
Mar	2010	WSR Combustion Sources	Stationary Comb	Methane	10228	bbi	4994	bbi	FuelUsage*HHV*EF*ConvLkg*ConvMmbtuMbu	337.826921	lb/month	0.153235866	MT/month	3.8308974	
Mar	2010	WSR Combustion Sources	Stationary Comb	Nitrogen Oxide	10228	bbi	4994	bbi	FuelUsage*HHV*EF*ConvLkg*ConvMmbtuMbu	67.56539421	lb/month	0.030647179	MT/month	9.132859402	
Apr	2010	WSR Combustion Sources	Stationary Comb	Carbon Dioxide	10552	bbi	4874	bbi	FuelUsage*HHV*EF*ConvLkg*ConvMmbtuMbu	7712420.102	lb/month	3498.299073	MT/month	3498.299073	
Apr	2010	WSR Combustion Sources	Stationary Comb	Methane	10552	bbi	4874	bbi	FuelUsage*HHV*EF*ConvLkg*ConvMmbtuMbu	340.1537828	lb/month	0.154291344	MT/month	3.8572636	
Apr	2010	WSR Combustion Sources	Stationary Comb	Nitrogen Oxide	10552	bbi	4874	bbi	FuelUsage*HHV*EF*ConvLkg*ConvMmbtuMbu	66.03079556	lb/month	0.030858269	MT/month	9.195764102	
May	2010	WSR Combustion Sources	Stationary Comb	Carbon Dioxide	9211	bbi	5033	bbi	FuelUsage*HHV*EF*ConvLkg*ConvMmbtuMbu	6951909.075	lb/month	3153.336663	MT/month	3153.336663	
May	2010	WSR Combustion Sources	Stationary Comb	Methane	9211	bbi	5033	bbi	FuelUsage*HHV*EF*ConvLkg*ConvMmbtuMbu	306.611691	lb/month	0.139076889	MT/month	3.478922225	
May	2010	WSR Combustion Sources	Stationary Comb	Nitrogen Oxide	9211	bbi	5033	bbi	FuelUsage*HHV*EF*ConvLkg*ConvMmbtuMbu	61.32233821	lb/month	0.027815378	MT/month	8.288982584	
Jun	2010	WSR Combustion Sources	Stationary Comb	Carbon Dioxide	9865	bbi	4969	bbi	FuelUsage*HHV*EF*ConvLkg*ConvMmbtuMbu	7550831.317	lb/month	3334.284984	MT/month	3334.284984	
Jun	2010	WSR Combustion Sources	Stationary Comb	Methane	9865	bbi	4969	bbi	FuelUsage*HHV*EF*ConvLkg*ConvMmbtuMbu	324.2060269	lb/month	0.147057555	MT/month	3.676498975	
Jun	2010	WSR Combustion Sources	Stationary Comb	Nitrogen Oxide	9865	bbi	4969	bbi	FuelUsage*HHV*EF*ConvLkg*ConvMmbtuMbu	64.84120538	lb/month	0.029411511	MT/month	8.764630276	
Jul	2010	WSR Combustion Sources	Stationary Comb	Carbon Dioxide	8677	bbi	5025	bbi	FuelUsage*HHV*EF*ConvLkg*ConvMmbtuMbu	6538468.474	lb/month	2965.802939	MT/month	2965.802939	
Jul	2010	WSR Combustion Sources	Stationary Comb	Methane	8677	bbi	5025	bbi	FuelUsage*HHV*EF*ConvLkg*ConvMmbtuMbu	286.3770277	lb/month	0.130805775	MT/month	3.270144375	
Jul	2010	WSR Combustion Sources	Stationary Comb	Nitrogen Oxide	8677	bbi	5025	bbi	FuelUsage*HHV*EF*ConvLkg*ConvMmbtuMbu	57.67505554	lb/month	0.026161155	MT/month	7.79602419	
Aug	2010	WSR Combustion Sources	Stationary Comb	Carbon Dioxide	8307	bbi	5036	bbi	FuelUsage*HHV*EF*ConvLkg*ConvMmbtuMbu	6273361.329	lb/month	2845.552217	MT/month	2845.552217	
Aug	2010	WSR Combustion Sources	Stationary Comb	Methane	8307	bbi	5036	bbi	FuelUsage*HHV*EF*ConvLkg*ConvMmbtuMbu	276.6945632	lb/month	0.125502156	MT/month	3.1375539	
Aug	2010	WSR Combustion Sources	Stationary Comb	Nitrogen Oxide	8307	bbi	5036	bbi	FuelUsage*HHV*EF*ConvLkg*ConvMmbtuMbu	55.33697263	lb/month	0.025100431	MT/month	7.479928498	
Sep	2010	WSR Combustion Sources	Stationary Comb	Carbon Dioxide	11208	bbi	5052	bbi	FuelUsage*HHV*EF*ConvLkg*ConvMmbtuMbu	8491058.533	lb/month	3851.483944	MT/month	3851.483944	

Sep	2010	WSR Combustion Sources	Stationary Comb	Methane	11208	bbi	5052	mbrubbi	FuelUsage*HHV*EF* ConvLkg * ConvMmbtuMbu	374.4953778	lb/month	0.169868448	MT/month	4.2467112
Sep	2010	WSR Combustion Sources	Stationary Comb	Nitrogen Oxide	11208	bbi	5052	mbrubbi	FuelUsage*HHV*EF* ConvLkg * ConvMmbtuMbu	74.89607557	lb/month	0.03397369	MT/month	10.1241595
Oct	2010	WSR Combustion Sources	Stationary Comb	Carbon Dioxide	11766	bbi	5010	mbrubbi	FuelUsage*HHV*EF* ConvLkg * ConvMmbtuMbu	8839660.077	lb/month	4009.619833	MT/month	4009.619833
Oct	2010	WSR Combustion Sources	Stationary Comb	Methane	11766	bbi	5010	mbrubbi	FuelUsage*HHV*EF* ConvLkg * ConvMmbtuMbu	389.8715706	lb/month	0.17684298	MT/month	4.4210745
Oct	2010	WSR Combustion Sources	Stationary Comb	Nitrogen Oxide	11766	bbi	5010	mbrubbi	FuelUsage*HHV*EF* ConvLkg * ConvMmbtuMbu	77.97431411	lb/month	0.035368596	MT/month	10.53984161
Nov	2010	WSR Combustion Sources	Stationary Comb	Carbon Dioxide	9426	bbi	5056	mbrubbi	FuelUsage*HHV*EF* ConvLkg * ConvMmbtuMbu	7146688.789	lb/month	3241.687365	MT/month	3241.687365
Nov	2010	WSR Combustion Sources	Stationary Comb	Methane	9426	bbi	5056	mbrubbi	FuelUsage*HHV*EF* ConvLkg * ConvMmbtuMbu	315.2023875	lb/month	0.142973568	MT/month	3.5743392
Nov	2010	WSR Combustion Sources	Stationary Comb	Nitrogen Oxide	9426	bbi	5056	mbrubbi	FuelUsage*HHV*EF* ConvLkg * ConvMmbtuMbu	63.0404775	lb/month	0.028594714	MT/month	8.52124653
Dec	2010	WSR Combustion Sources	Stationary Comb	Carbon Dioxide	13454	bbi	5052	mbrubbi	FuelUsage*HHV*EF* ConvLkg * ConvMmbtuMbu	10192603.63	lb/month	4823.282736	MT/month	4823.282736
Dec	2010	WSR Combustion Sources	Stationary Comb	Methane	13454	bbi	5052	mbrubbi	FuelUsage*HHV*EF* ConvLkg * ConvMmbtuMbu	449.5414716	lb/month	0.203908824	MT/month	5.0977206
Dec	2010	WSR Combustion Sources	Stationary Comb	Nitrogen Oxide	13454	bbi	5052	mbrubbi	FuelUsage*HHV*EF* ConvLkg * ConvMmbtuMbu	89.90629431	lb/month	0.040781765	MT/month	12.15296591
Jan	2009	WSR Combustion Sources	Stationary Comb	Carbon Dioxide	16861	bbi	4874	mbrubbi	FuelUsage*HHV*EF* ConvLkg * ConvMmbtuMbu	12427312.4	lb/month	5638.940788	MT/month	5638.940788
Jan	2009	WSR Combustion Sources	Stationary Comb	Methane	16861	bbi	4874	mbrubbi	FuelUsage*HHV*EF* ConvLkg * ConvMmbtuMbu	548.1029757	lb/month	0.248615442	MT/month	6.21538605
Jan	2009	WSR Combustion Sources	Stationary Comb	Nitrogen Oxide	16861	bbi	4874	mbrubbi	FuelUsage*HHV*EF* ConvLkg * ConvMmbtuMbu	109.6205151	lb/month	0.049723088	MT/month	14.81748034
Feb	2009	WSR Combustion Sources	Stationary Comb	Carbon Dioxide	12224	bbi	4812	mbrubbi	FuelUsage*HHV*EF* ConvLkg * ConvMmbtuMbu	9004136.495	lb/month	4084.21247	MT/month	4084.21247
Feb	2009	WSR Combustion Sources	Stationary Comb	Methane	12224	bbi	4812	mbrubbi	FuelUsage*HHV*EF* ConvLkg * ConvMmbtuMbu	397.1245146	lb/month	0.180132864	MT/month	4.5033216
Feb	2009	WSR Combustion Sources	Stationary Comb	Nitrogen Oxide	12224	bbi	4812	mbrubbi	FuelUsage*HHV*EF* ConvLkg * ConvMmbtuMbu	79.42490293	lb/month	0.036026573	MT/month	10.73591869
Mar	2009	WSR Combustion Sources	Stationary Comb	Carbon Dioxide	11897	bbi	5008	mbrubbi	FuelUsage*HHV*EF* ConvLkg * ConvMmbtuMbu	8924539.071	lb/month	4052.643572	MT/month	4052.643572
Mar	2009	WSR Combustion Sources	Stationary Comb	Methane	11897	bbi	5008	mbrubbi	FuelUsage*HHV*EF* ConvLkg * ConvMmbtuMbu	394.0549428	lb/month	0.178740528	MT/month	4.4685132
Mar	2009	WSR Combustion Sources	Stationary Comb	Nitrogen Oxide	11897	bbi	5008	mbrubbi	FuelUsage*HHV*EF* ConvLkg * ConvMmbtuMbu	78.81098857	lb/month	0.035748106	MT/month	10.65293547
Apr	2009	WSR Combustion Sources	Stationary Comb	Carbon Dioxide	11312	bbi	5008	mbrubbi	FuelUsage*HHV*EF* ConvLkg * ConvMmbtuMbu	8491816.722	lb/month	3851.827853	MT/month	3851.827853
Apr	2009	WSR Combustion Sources	Stationary Comb	Methane	11312	bbi	5008	mbrubbi	FuelUsage*HHV*EF* ConvLkg * ConvMmbtuMbu	374.5288175	lb/month	0.169883616	MT/month	4.2470904
Apr	2009	WSR Combustion Sources	Stationary Comb	Nitrogen Oxide	11312	bbi	5008	mbrubbi	FuelUsage*HHV*EF* ConvLkg * ConvMmbtuMbu	74.9057635	lb/month	0.033976723	MT/month	10.12506351
May	2009	WSR Combustion Sources	Stationary Comb	Carbon Dioxide	8712	bbi	5045	mbrubbi	FuelUsage*HHV*EF* ConvLkg * ConvMmbtuMbu	6590971.108	lb/month	2989.617761	MT/month	2989.617761
May	2009	WSR Combustion Sources	Stationary Comb	Methane	8712	bbi	5045	mbrubbi	FuelUsage*HHV*EF* ConvLkg * ConvMmbtuMbu	290.6926393	lb/month	0.13185612	MT/month	3.296403
May	2009	WSR Combustion Sources	Stationary Comb	Nitrogen Oxide	8712	bbi	5045	mbrubbi	FuelUsage*HHV*EF* ConvLkg * ConvMmbtuMbu	58.13852785	lb/month	0.026371224	MT/month	7.856824752

Jun	2009	WSR Combustion Sources	Stationary Comb	Carbon Dioxide	9204	bbi	5046	mbtu/bbl	FuelUsage*HHV*EF* ConvLkg*ConvMmbtuMbu	6964568.7	lb/month	3159.07898	MT/month	3159.07898
Jun	2009	WSR Combustion Sources	Stationary Comb	Methane	9204	bbi	5046	mbtu/bbl	FuelUsage*HHV*EF* ConvLkg*ConvMmbtuMbu	307.1700397	lb/month	0.139330152	MT/month	3.4832538
Jun	2009	WSR Combustion Sources	Stationary Comb	Nitrogen Oxide	9204	bbi	5046	mbtu/bbl	FuelUsage*HHV*EF* ConvLkg*ConvMmbtuMbu	61.43400794	lb/month	0.02786603	MT/month	8.304077059
Jul	2009	WSR Combustion Sources	Stationary Comb	Carbon Dioxide	6502	bbi	5018	mbtu/bbl	FuelUsage*HHV*EF* ConvLkg*ConvMmbtuMbu	4892693.3	lb/month	2219.290989	MT/month	2219.290989
Jul	2009	WSR Combustion Sources	Stationary Comb	Methane	6502	bbi	5018	mbtu/bbl	FuelUsage*HHV*EF* ConvLkg*ConvMmbtuMbu	215.7906483	lb/month	0.097881108	MT/month	2.4470277
Jul	2009	WSR Combustion Sources	Stationary Comb	Nitrogen Oxide	6502	bbi	5018	mbtu/bbl	FuelUsage*HHV*EF* ConvLkg*ConvMmbtuMbu	43.15812866	lb/month	0.019576222	MT/month	5.833714037
Aug	2009	WSR Combustion Sources	Stationary Comb	Carbon Dioxide	6333	bbi	5063	mbtu/bbl	FuelUsage*HHV*EF* ConvLkg*ConvMmbtuMbu	4808268.256	lb/month	2180.991852	MT/month	2180.991852
Aug	2009	WSR Combustion Sources	Stationary Comb	Methane	6333	bbi	5063	mbtu/bbl	FuelUsage*HHV*EF* ConvLkg*ConvMmbtuMbu	212.0666681	lb/month	0.096191937	MT/month	2.404798425
Aug	2009	WSR Combustion Sources	Stationary Comb	Nitrogen Oxide	6333	bbi	5063	mbtu/bbl	FuelUsage*HHV*EF* ConvLkg*ConvMmbtuMbu	42.41333363	lb/month	0.019236387	MT/month	5.733039445
Sep	2009	WSR Combustion Sources	Stationary Comb	Carbon Dioxide	10866	bbi	5009	mbtu/bbl	FuelUsage*HHV*EF* ConvLkg*ConvMmbtuMbu	8161896.87	lb/month	3702.178548	MT/month	3702.178548
Sep	2009	WSR Combustion Sources	Stationary Comb	Methane	10866	bbi	5009	mbtu/bbl	FuelUsage*HHV*EF* ConvLkg*ConvMmbtuMbu	359.9770096	lb/month	0.163283382	MT/month	4.08208455
Sep	2009	WSR Combustion Sources	Stationary Comb	Nitrogen Oxide	10866	bbi	5009	mbtu/bbl	FuelUsage*HHV*EF* ConvLkg*ConvMmbtuMbu	71.99556192	lb/month	0.032656676	MT/month	9.731689567
Oct	2009	WSR Combustion Sources	Stationary Comb	Carbon Dioxide	10849	bbi	4992	mbtu/bbl	FuelUsage*HHV*EF* ConvLkg*ConvMmbtuMbu	8121470.225	lb/month	3683.841308	MT/month	3683.841308
Oct	2009	WSR Combustion Sources	Stationary Comb	Methane	10849	bbi	4992	mbtu/bbl	FuelUsage*HHV*EF* ConvLkg*ConvMmbtuMbu	358.1948056	lb/month	0.162474624	MT/month	4.0618656
Oct	2009	WSR Combustion Sources	Stationary Comb	Nitrogen Oxide	10849	bbi	4992	mbtu/bbl	FuelUsage*HHV*EF* ConvLkg*ConvMmbtuMbu	71.63896111	lb/month	0.032494925	MT/month	9.66348759
Nov	2009	WSR Combustion Sources	Stationary Comb	Carbon Dioxide	11055	bbi	5034	mbtu/bbl	FuelUsage*HHV*EF* ConvLkg*ConvMmbtuMbu	8345307.21	lb/month	3785.372177	MT/month	3785.372177
Nov	2009	WSR Combustion Sources	Stationary Comb	Methane	11055	bbi	5034	mbtu/bbl	FuelUsage*HHV*EF* ConvLkg*ConvMmbtuMbu	388.0670631	lb/month	0.16895261	MT/month	4.17381525
Nov	2009	WSR Combustion Sources	Stationary Comb	Nitrogen Oxide	11055	bbi	5034	mbtu/bbl	FuelUsage*HHV*EF* ConvLkg*ConvMmbtuMbu	73.61341261	lb/month	0.033396522	MT/month	9.950375556
Dec	2009	WSR Combustion Sources	Stationary Comb	Carbon Dioxide	16053	bbi	5012	mbtu/bbl	FuelUsage*HHV*EF* ConvLkg*ConvMmbtuMbu	12065286.49	lb/month	5472.728401	MT/month	5472.728401
Dec	2009	WSR Combustion Sources	Stationary Comb	Methane	16053	bbi	5012	mbtu/bbl	FuelUsage*HHV*EF* ConvLkg*ConvMmbtuMbu	532.1355404	lb/month	0.241372908	MT/month	6.0343227
Dec	2009	WSR Combustion Sources	Stationary Comb	Nitrogen Oxide	16053	bbi	5012	mbtu/bbl	FuelUsage*HHV*EF* ConvLkg*ConvMmbtuMbu	106.4271081	lb/month	0.048274582	MT/month	14.38582532
Jan	2008	WSR Combustion Sources	Stationary Comb	Carbon Dioxide	9132	bbi	5155	mbtu/bbl	FuelUsage*HHV*EF* ConvLkg*ConvMmbtuMbu	7059383.713	lb/month	3202.072789	MT/month	3202.072789
Jan	2008	WSR Combustion Sources	Stationary Comb	Methane	9132	bbi	5155	mbtu/bbl	FuelUsage*HHV*EF* ConvLkg*ConvMmbtuMbu	311.3505019	lb/month	0.14122638	MT/month	3.5366595
Jan	2008	WSR Combustion Sources	Stationary Comb	Nitrogen Oxide	9132	bbi	5155	mbtu/bbl	FuelUsage*HHV*EF* ConvLkg*ConvMmbtuMbu	62.27010038	lb/month	0.028245276	MT/month	8.417092248
Feb	2008	WSR Combustion Sources	Stationary Comb	Carbon Dioxide	6836	bbi	5155	mbtu/bbl	FuelUsage*HHV*EF* ConvLkg*ConvMmbtuMbu	5284465.832	lb/month	2396.996232	MT/month	2396.996232
Feb	2008	WSR Combustion Sources	Stationary Comb	Methane	6836	bbi	5155	mbtu/bbl	FuelUsage*HHV*EF* ConvLkg*ConvMmbtuMbu	233.0696486	lb/month	0.10571874	MT/month	2.6429685

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WSR Comb

Feb	2008	WSR Combustion Sources	Stationary Comb	Nitrogen Oxide	6836		bbi	5155	mbru/bbi	FuelUsage*HHV*EF * ConvLkg * ConvMmbtuMbu	46.61392972	lb/month	0.021143748	MT/month	6.300836904
Mar	2008	WSR Combustion Sources	Stationary Comb	Carbon Dioxide	10206		bbi	5155	mbru/bbi	FuelUsage*HHV*EF * ConvLkg * ConvMmbtuMbu	789593.078	lb/month	3578.663479	MT/month	3578.663479
Mar	2008	WSR Combustion Sources	Stationary Comb	Methane	10206		bbi	5155	mbru/bbi	FuelUsage*HHV*EF * ConvLkg * ConvMmbtuMbu	347.9673993	lb/month	0.15183579	MT/month	3.94569475
Mar	2008	WSR Combustion Sources	Stationary Comb	Nitrogen Oxide	10206		bbi	5155	mbru/bbi	FuelUsage*HHV*EF * ConvLkg * ConvMmbtuMbu	69.59358787	lb/month	0.031567158	MT/month	9.40703084
Apr	2008	WSR Combustion Sources	Stationary Comb	Carbon Dioxide	9546		bbi	5155	mbru/bbi	FuelUsage*HHV*EF * ConvLkg * ConvMmbtuMbu	7379390.116	lb/month	3347.239033	MT/month	3347.239033
Apr	2008	WSR Combustion Sources	Stationary Comb	Methane	9546		bbi	5155	mbru/bbi	FuelUsage*HHV*EF * ConvLkg * ConvMmbtuMbu	325.4656635	lb/month	0.14762889	MT/month	3.69072225
Apr	2008	WSR Combustion Sources	Stationary Comb	Nitrogen Oxide	9546		bbi	5155	mbru/bbi	FuelUsage*HHV*EF * ConvLkg * ConvMmbtuMbu	65.09312069	lb/month	0.029625778	MT/month	8.796681844
May	2008	WSR Combustion Sources	Stationary Comb	Carbon Dioxide	9989		bbi	5155	mbru/bbi	FuelUsage*HHV*EF * ConvLkg * ConvMmbtuMbu	7721844.529	lb/month	3502.573926	MT/month	3502.573926
May	2008	WSR Combustion Sources	Stationary Comb	Methane	9989		bbi	5155	mbru/bbi	FuelUsage*HHV*EF * ConvLkg * ConvMmbtuMbu	340.5694441	lb/month	0.154479885	MT/month	3.861987125
May	2008	WSR Combustion Sources	Stationary Comb	Nitrogen Oxide	9989		bbi	5155	mbru/bbi	FuelUsage*HHV*EF * ConvLkg * ConvMmbtuMbu	68.11388881	lb/month	0.030865977	MT/month	9.207001146
Jun	2008	WSR Combustion Sources	Stationary Comb	Carbon Dioxide	5839		bbi	5155	mbru/bbi	FuelUsage*HHV*EF * ConvLkg * ConvMmbtuMbu	4513750.145	lb/month	2047.405061	MT/month	2047.405061
Jun	2008	WSR Combustion Sources	Stationary Comb	Methane	5839		bbi	5155	mbru/bbi	FuelUsage*HHV*EF * ConvLkg * ConvMmbtuMbu	199.0774836	lb/month	0.090300135	MT/month	2.257503375
Jun	2008	WSR Combustion Sources	Stationary Comb	Nitrogen Oxide	5839		bbi	5155	mbru/bbi	FuelUsage*HHV*EF * ConvLkg * ConvMmbtuMbu	39.81548672	lb/month	0.018060027	MT/month	5.381888046
Jul	2008	WSR Combustion Sources	Stationary Comb	Carbon Dioxide	10414		bbi	5155	mbru/bbi	FuelUsage*HHV*EF * ConvLkg * ConvMmbtuMbu	8650384.315	lb/month	3651.597243	MT/month	3651.597243
Jul	2008	WSR Combustion Sources	Stationary Comb	Methane	10414		bbi	5155	mbru/bbi	FuelUsage*HHV*EF * ConvLkg * ConvMmbtuMbu	355.0595846	lb/month	0.16105251	MT/month	4.02631275
Jul	2008	WSR Combustion Sources	Stationary Comb	Nitrogen Oxide	10414		bbi	5155	mbru/bbi	FuelUsage*HHV*EF * ConvLkg * ConvMmbtuMbu	71.01191692	lb/month	0.032210502	MT/month	9.598729596
Aug	2008	WSR Combustion Sources	Stationary Comb	Carbon Dioxide	8243		bbi	5155	mbru/bbi	FuelUsage*HHV*EF * ConvLkg * ConvMmbtuMbu	6372125.783	lb/month	2890.351073	MT/month	2890.351073
Aug	2008	WSR Combustion Sources	Stationary Comb	Methane	8243		bbi	5155	mbru/bbi	FuelUsage*HHV*EF * ConvLkg * ConvMmbtuMbu	281.0405373	lb/month	0.127477995	MT/month	3.186949875
Aug	2008	WSR Combustion Sources	Stationary Comb	Nitrogen Oxide	8243		bbi	5155	mbru/bbi	FuelUsage*HHV*EF * ConvLkg * ConvMmbtuMbu	56.20610747	lb/month	0.025495599	MT/month	7.597669502
Sep	2008	WSR Combustion Sources	Stationary Comb	Carbon Dioxide	8599		bbi	5155	mbru/bbi	FuelUsage*HHV*EF * ConvLkg * ConvMmbtuMbu	6647326.769	lb/month	3015.180017	MT/month	3015.180017
Sep	2008	WSR Combustion Sources	Stationary Comb	Methane	8599		bbi	5155	mbru/bbi	FuelUsage*HHV*EF * ConvLkg * ConvMmbtuMbu	293.1781609	lb/month	0.132983535	MT/month	3.324568375
Sep	2008	WSR Combustion Sources	Stationary Comb	Nitrogen Oxide	8599		bbi	5155	mbru/bbi	FuelUsage*HHV*EF * ConvLkg * ConvMmbtuMbu	58.63563219	lb/month	0.026596707	MT/month	7.926818686
Oct	2008	WSR Combustion Sources	Stationary Comb	Carbon Dioxide	6073		bbi	5155	mbru/bbi	FuelUsage*HHV*EF * ConvLkg * ConvMmbtuMbu	4694640.286	lb/month	2129.455546	MT/month	2129.455546
Oct	2008	WSR Combustion Sources	Stationary Comb	Methane	6073		bbi	5155	mbru/bbi	FuelUsage*HHV*EF * ConvLkg * ConvMmbtuMbu	207.0555845	lb/month	0.093916945	MT/month	2.347973625
Oct	2008	WSR Combustion Sources	Stationary Comb	Nitrogen Oxide	6073		bbi	5155	mbru/bbi	FuelUsage*HHV*EF * ConvLkg * ConvMmbtuMbu	41.41111691	lb/month	0.018783789	MT/month	5.597569122
Nov	2008	WSR Combustion Sources	Stationary Comb	Carbon Dioxide	9554		bbi	5155	mbru/bbi	FuelUsage*HHV*EF * ConvLkg * ConvMmbtuMbu	7370113.699	lb/month	3343.031315	MT/month	3343.031315

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WSR Comb

Nov	2008	WSR Combustion Sources	Stationary Comb	Methane	9534	bbi	5155	mbtu/bbl	FuelUsage*HHV*EF* ConvLkg*ConvMmbtuMbu	325.0564701	lb/month	0.14744331	MT/month	3.68608275
Nov	2008	WSR Combustion Sources	Stationary Comb	Nitrogen Oxide	9534	bbi	5155	mbtu/bbl	FuelUsage*HHV*EF* ConvLkg*ConvMmbtuMbu	65.01129402	lb/month	0.029486862	MT/month	8.787521276
Dec	2008	WSR Combustion Sources	Stationary Comb	Carbon Dioxide	14858	bbi	5155	mbtu/bbl	FuelUsage*HHV*EF* ConvLkg*ConvMmbtuMbu	114857.50.93	lb/month	5209.85518	MT/month	5209.85518
Dec	2008	WSR Combustion Sources	Stationary Comb	Methane	14858	bbi	5155	mbtu/bbl	FuelUsage*HHV*EF* ConvLkg*ConvMmbtuMbu	506.5753128	lb/month	0.22877897	MT/month	5.74447425
Dec	2008	WSR Combustion Sources	Stationary Comb	Nitrogen Oxide	14858	bbi	5155	mbtu/bbl	FuelUsage*HHV*EF* ConvLkg*ConvMmbtuMbu	101.3150626	lb/month	0.045955784	MT/month	13.69482861
Jan	2007	WSR Combustion Sources	Stationary Comb	Carbon Dioxide	10128	bbi	5155	mbtu/bbl	FuelUsage*HHV*EF* ConvLkg*ConvMmbtuMbu	7823296.364	lb/month	3551.313317	MT/month	3651.313317
Jan	2007	WSR Combustion Sources	Stationary Comb	Methane	10128	bbi	5155	mbtu/bbl	FuelUsage*HHV*EF* ConvLkg*ConvMmbtuMbu	345.3085724	lb/month	0.15662952	MT/month	3.915738
Jan	2007	WSR Combustion Sources	Stationary Comb	Nitrogen Oxide	10128	bbi	5155	mbtu/bbl	FuelUsage*HHV*EF* ConvLkg*ConvMmbtuMbu	69.06171448	lb/month	0.031325904	MT/month	9.335119392
Feb	2007	WSR Combustion Sources	Stationary Comb	Carbon Dioxide	10879	bbi	5155	mbtu/bbl	FuelUsage*HHV*EF* ConvLkg*ConvMmbtuMbu	8409845.493	lb/month	3814.646285	MT/month	3814.646285
Feb	2007	WSR Combustion Sources	Stationary Comb	Methane	10879	bbi	5155	mbtu/bbl	FuelUsage*HHV*EF* ConvLkg*ConvMmbtuMbu	370.9135031	lb/month	0.168243735	MT/month	4.206093375
Feb	2007	WSR Combustion Sources	Stationary Comb	Nitrogen Oxide	10879	bbi	5155	mbtu/bbl	FuelUsage*HHV*EF* ConvLkg*ConvMmbtuMbu	74.18270061	lb/month	0.033648747	MT/month	10.02732861
Mar	2007	WSR Combustion Sources	Stationary Comb	Carbon Dioxide	8456	bbi	5155	mbtu/bbl	FuelUsage*HHV*EF* ConvLkg*ConvMmbtuMbu	6536782.194	lb/month	2965.038054	MT/month	2965.038054
Mar	2007	WSR Combustion Sources	Stationary Comb	Methane	8456	bbi	5155	mbtu/bbl	FuelUsage*HHV*EF* ConvLkg*ConvMmbtuMbu	288.3026548	lb/month	0.13077204	MT/month	3.269301
Mar	2007	WSR Combustion Sources	Stationary Comb	Nitrogen Oxide	8456	bbi	5155	mbtu/bbl	FuelUsage*HHV*EF* ConvLkg*ConvMmbtuMbu	57.66053096	lb/month	0.0286154408	MT/month	7.794013584
Apr	2007	WSR Combustion Sources	Stationary Comb	Carbon Dioxide	11514	bbi	5155	mbtu/bbl	FuelUsage*HHV*EF* ConvLkg*ConvMmbtuMbu	8900722.585	lb/month	4037.304653	MT/month	4037.304653
Apr	2007	WSR Combustion Sources	Stationary Comb	Methane	11514	bbi	5155	mbtu/bbl	FuelUsage*HHV*EF* ConvLkg*ConvMmbtuMbu	392.5634777	lb/month	0.17806401	MT/month	4.45160025
Apr	2007	WSR Combustion Sources	Stationary Comb	Nitrogen Oxide	11514	bbi	5155	mbtu/bbl	FuelUsage*HHV*EF* ConvLkg*ConvMmbtuMbu	78.51289555	lb/month	0.035612802	MT/month	10.612615
May	2007	WSR Combustion Sources	Stationary Comb	Carbon Dioxide	12031	bbi	5155	mbtu/bbl	FuelUsage*HHV*EF* ConvLkg*ConvMmbtuMbu	9300381.572	lb/month	4218.587136	MT/month	4218.587136
May	2007	WSR Combustion Sources	Stationary Comb	Methane	12031	bbi	5155	mbtu/bbl	FuelUsage*HHV*EF* ConvLkg*ConvMmbtuMbu	410.1903075	lb/month	0.186059415	MT/month	4.651485375
May	2007	WSR Combustion Sources	Stationary Comb	Nitrogen Oxide	12031	bbi	5155	mbtu/bbl	FuelUsage*HHV*EF* ConvLkg*ConvMmbtuMbu	82.0380615	lb/month	0.037211883	MT/month	11.08974113
Jun	2007	WSR Combustion Sources	Stationary Comb	Carbon Dioxide	8585	bbi	5155	mbtu/bbl	FuelUsage*HHV*EF* ConvLkg*ConvMmbtuMbu	6636503.682	lb/month	3010.271014	MT/month	3010.271014
Jun	2007	WSR Combustion Sources	Stationary Comb	Methane	8585	bbi	5155	mbtu/bbl	FuelUsage*HHV*EF* ConvLkg*ConvMmbtuMbu	292.7008387	lb/month	0.132767025	MT/month	3.319175625
Jun	2007	WSR Combustion Sources	Stationary Comb	Nitrogen Oxide	8585	bbi	5155	mbtu/bbl	FuelUsage*HHV*EF* ConvLkg*ConvMmbtuMbu	58.54016773	lb/month	0.028553405	MT/month	7.91291469
Jul	2007	WSR Combustion Sources	Stationary Comb	Carbon Dioxide	6426	bbi	5155	mbtu/bbl	FuelUsage*HHV*EF* ConvLkg*ConvMmbtuMbu	4867521.568	lb/month	2253.232561	MT/month	2253.232561
Jul	2007	WSR Combustion Sources	Stationary Comb	Methane	6426	bbi	5155	mbtu/bbl	FuelUsage*HHV*EF* ConvLkg*ConvMmbtuMbu	219.0909248	lb/month	0.09937009	MT/month	2.48445225
Jul	2007	WSR Combustion Sources	Stationary Comb	Nitrogen Oxide	6426	bbi	5155	mbtu/bbl	FuelUsage*HHV*EF* ConvLkg*ConvMmbtuMbu	43.81818496	lb/month	0.019873618	MT/month	5.922934164

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WSR Comb

Aug	2007	WSR Combustion Sources	Stationary Comb	Carbon Dioxide	7260	bbi	5155	mblu/bbl	FuelUsage*HHV*EF * ConvLkg * ConvMmbtuMbu	5612232.584	lb/month	2645.668906	MT/month	2545.668906
Aug	2007	WSR Combustion Sources	Stationary Comb	Methane	7260	bbi	5155	mblu/bbl	FuelUsage*HHV*EF * ConvLkg * ConvMmbtuMbu	247.5256947	lb/month	0.1122759	MT/month	2.8688975
Aug	2007	WSR Combustion Sources	Stationary Comb	Nitrogen Oxide	7260	bbi	5155	mblu/bbl	FuelUsage*HHV*EF * ConvLkg * ConvMmbtuMbu	49.50513683	lb/month	0.02245518	MT/month	6.69164364
Sep	2007	WSR Combustion Sources	Stationary Comb	Carbon Dioxide	6617	bbi	5155	mblu/bbl	FuelUsage*HHV*EF * ConvLkg * ConvMmbtuMbu	5115171.213	lb/month	2320.205393	MT/month	2320.205393
Sep	2007	WSR Combustion Sources	Stationary Comb	Methane	6617	bbi	5155	mblu/bbl	FuelUsage*HHV*EF * ConvLkg * ConvMmbtuMbu	225.6029644	lb/month	0.102331905	MT/month	2.558297625
Sep	2007	WSR Combustion Sources	Stationary Comb	Nitrogen Oxide	6617	bbi	5155	mblu/bbl	FuelUsage*HHV*EF * ConvLkg * ConvMmbtuMbu	45.12059288	lb/month	0.020466381	MT/month	6.098981538
Oct	2007	WSR Combustion Sources	Stationary Comb	Carbon Dioxide	6964	bbi	5155	mblu/bbl	FuelUsage*HHV*EF * ConvLkg * ConvMmbtuMbu	5363414.285	lb/month	2441.878548	MT/month	2441.878548
Oct	2007	WSR Combustion Sources	Stationary Comb	Methane	6964	bbi	5155	mblu/bbl	FuelUsage*HHV*EF * ConvLkg * ConvMmbtuMbu	237.433738	lb/month	0.10768826	MT/month	2.6924655
Oct	2007	WSR Combustion Sources	Stationary Comb	Nitrogen Oxide	6964	bbi	5155	mblu/bbl	FuelUsage*HHV*EF * ConvLkg * ConvMmbtuMbu	47.48674759	lb/month	0.021539652	MT/month	6.418816286
Nov	2007	WSR Combustion Sources	Stationary Comb	Carbon Dioxide	7110	bbi	5155	mblu/bbl	FuelUsage*HHV*EF * ConvLkg * ConvMmbtuMbu	5496277.365	lb/month	2493.072441	MT/month	2493.072441
Nov	2007	WSR Combustion Sources	Stationary Comb	Methane	7110	bbi	5155	mblu/bbl	FuelUsage*HHV*EF * ConvLkg * ConvMmbtuMbu	242.4115274	lb/month	0.10895615	MT/month	2.74890375
Nov	2007	WSR Combustion Sources	Stationary Comb	Nitrogen Oxide	7110	bbi	5155	mblu/bbl	FuelUsage*HHV*EF * ConvLkg * ConvMmbtuMbu	48.48230548	lb/month	0.02199123	MT/month	6.55338654
Dec	2007	WSR Combustion Sources	Stationary Comb	Carbon Dioxide	5591	bbi	5155	mblu/bbl	FuelUsage*HHV*EF * ConvLkg * ConvMmbtuMbu	4322037.517	lb/month	1960.445572	MT/month	1960.445572
Dec	2007	WSR Combustion Sources	Stationary Comb	Methane	5591	bbi	5155	mblu/bbl	FuelUsage*HHV*EF * ConvLkg * ConvMmbtuMbu	190.6220604	lb/month	0.086464815	MT/month	2.161620375
Dec	2007	WSR Combustion Sources	Stationary Comb	Nitrogen Oxide	5591	bbi	5155	mblu/bbl	FuelUsage*HHV*EF * ConvLkg * ConvMmbtuMbu	38.12441209	lb/month	0.017282863	MT/month	5.153302974
Jan	2006	WSR Combustion Sources	Stationary Comb	Carbon Dioxide	12713	bbi	5155	mblu/bbl	FuelUsage*HHV*EF * ConvLkg * ConvMmbtuMbu	9827591.3	lb/month	4487.72573	MT/month	4487.72573
Jan	2006	WSR Combustion Sources	Stationary Comb	Methane	12713	bbi	5155	mblu/bbl	FuelUsage*HHV*EF * ConvLkg * ConvMmbtuMbu	433.4427212	lb/month	0.196806545	MT/month	4.915163625
Jan	2006	WSR Combustion Sources	Stationary Comb	Nitrogen Oxide	12713	bbi	5155	mblu/bbl	FuelUsage*HHV*EF * ConvLkg * ConvMmbtuMbu	86.68854425	lb/month	0.039321309	MT/month	11.71775008
Feb	2006	WSR Combustion Sources	Stationary Comb	Carbon Dioxide	14358	bbi	5155	mblu/bbl	FuelUsage*HHV*EF * ConvLkg * ConvMmbtuMbu	11099233.53	lb/month	5034.53363	MT/month	5034.53363
Feb	2006	WSR Combustion Sources	Stationary Comb	Methane	14358	bbi	5155	mblu/bbl	FuelUsage*HHV*EF * ConvLkg * ConvMmbtuMbu	489.5280887	lb/month	0.22204647	MT/month	5.55116175
Feb	2006	WSR Combustion Sources	Stationary Comb	Nitrogen Oxide	14358	bbi	5155	mblu/bbl	FuelUsage*HHV*EF * ConvLkg * ConvMmbtuMbu	97.90561774	lb/month	0.044409284	MT/month	13.23396961
Mar	2006	WSR Combustion Sources	Stationary Comb	Carbon Dioxide	17063	bbi	5155	mblu/bbl	FuelUsage*HHV*EF * ConvLkg * ConvMmbtuMbu	13182562.29	lb/month	5979.516784	MT/month	5979.516784
Mar	2006	WSR Combustion Sources	Stationary Comb	Methane	17063	bbi	5155	mblu/bbl	FuelUsage*HHV*EF * ConvLkg * ConvMmbtuMbu	581.4126269	lb/month	0.263724645	MT/month	6.593116125
Mar	2006	WSR Combustion Sources	Stationary Comb	Nitrogen Oxide	17063	bbi	5155	mblu/bbl	FuelUsage*HHV*EF * ConvLkg * ConvMmbtuMbu	116.2825254	lb/month	0.052744929	MT/month	15.71798884
Apr	2006	WSR Combustion Sources	Stationary Comb	Carbon Dioxide	10694	bbi	5155	mblu/bbl	FuelUsage*HHV*EF * ConvLkg * ConvMmbtuMbu	8286834.056	lb/month	3749.777311	MT/month	3749.777311
Apr	2006	WSR Combustion Sources	Stationary Comb	Methane	10694	bbi	5155	mblu/bbl	FuelUsage*HHV*EF * ConvLkg * ConvMmbtuMbu	364.6060301	lb/month	0.16538271	MT/month	4.13456775

Apr	2006	WSR Combustion Sources	Stationary Comb	Nitrogen Oxide	10694	bbi	5155	mtbu/bbl	FuelUsage*HHV*EF* ConvLkg*ConvMmbtuMbu	72 92120602	lb/month	0.033076542	MT/month	9.858809516
May	2006	WSR Combustion Sources	Stationary Comb	Carbon Dioxide	6997	bbi	5155	mtbu/bbl	FuelUsage*HHV*EF* ConvLkg*ConvMmbtuMbu	4635889.642	lb/month	2.102 806871	MT/month	2.102 806871
May	2006	WSR Combustion Sources	Stationary Comb	Methane	6997	bbi	5155	mtbu/bbl	FuelUsage*HHV*EF* ConvLkg*ConvMmbtuMbu	204 4644065	lb/month	0.092743605	MT/month	2.318590125
May	2006	WSR Combustion Sources	Stationary Comb	Nitrogen Oxide	6997	bbi	5155	mtbu/bbl	FuelUsage*HHV*EF* ConvLkg*ConvMmbtuMbu	40 89288129	lb/month	0.018548721	MT/month	5.527518858
Jun	2006	WSR Combustion Sources	Stationary Comb	Carbon Dioxide	6636	bbi	5155	mtbu/bbl	FuelUsage*HHV*EF* ConvLkg*ConvMmbtuMbu	5129658.874	lb/month	2326 867612	MT/month	2326 867612
Jun	2006	WSR Combustion Sources	Stationary Comb	Methane	6636	bbi	5155	mtbu/bbl	FuelUsage*HHV*EF* ConvLkg*ConvMmbtuMbu	226 2507589	lb/month	0.10262574	MT/month	2.56554335
Jun	2006	WSR Combustion Sources	Stationary Comb	Nitrogen Oxide	6636	bbi	5155	mtbu/bbl	FuelUsage*HHV*EF* ConvLkg*ConvMmbtuMbu	45 25015178	lb/month	0.020525148	MT/month	6.116494104
Jul	2006	WSR Combustion Sources	Stationary Comb	Carbon Dioxide	6739	bbi	5155	mtbu/bbl	FuelUsage*HHV*EF* ConvLkg*ConvMmbtuMbu	5209481 457	lb/month	2362 983851	MT/month	2362 983851
Jul	2006	WSR Combustion Sources	Stationary Comb	Methane	6739	bbi	5155	mtbu/bbl	FuelUsage*HHV*EF* ConvLkg*ConvMmbtuMbu	229 7624871	lb/month	0.104218635	MT/month	2.605465875
Jul	2006	WSR Combustion Sources	Stationary Comb	Nitrogen Oxide	6739	bbi	5155	mtbu/bbl	FuelUsage*HHV*EF* ConvLkg*ConvMmbtuMbu	45 95249742	lb/month	0.020843727	MT/month	6.211430646
Aug	2006	WSR Combustion Sources	Stationary Comb	Carbon Dioxide	6956	bbi	5155	mtbu/bbl	FuelUsage*HHV*EF* ConvLkg*ConvMmbtuMbu	5377230 007	lb/month	2439 073404	MT/month	2439 073404
Aug	2006	WSR Combustion Sources	Stationary Comb	Methane	6956	bbi	5155	mtbu/bbl	FuelUsage*HHV*EF* ConvLkg*ConvMmbtuMbu	237 1609824	lb/month	0.107575454	MT/month	2.68936335
Aug	2006	WSR Combustion Sources	Stationary Comb	Nitrogen Oxide	6956	bbi	5155	mtbu/bbl	FuelUsage*HHV*EF* ConvLkg*ConvMmbtuMbu	47 43219647	lb/month	0.021514908	MT/month	6.411442584
Sep	2006	WSR Combustion Sources	Stationary Comb	Carbon Dioxide	7047	bbi	5155	mtbu/bbl	FuelUsage*HHV*EF* ConvLkg*ConvMmbtuMbu	5447576 173	lb/month	2470 881926	MT/month	2470 881926
Sep	2006	WSR Combustion Sources	Stationary Comb	Methane	7047	bbi	5155	mtbu/bbl	FuelUsage*HHV*EF* ConvLkg*ConvMmbtuMbu	240 2633772	lb/month	0.108981855	MT/month	2.724546375
Sep	2006	WSR Combustion Sources	Stationary Comb	Nitrogen Oxide	7047	bbi	5155	mtbu/bbl	FuelUsage*HHV*EF* ConvLkg*ConvMmbtuMbu	48 05271543	lb/month	0.021796371	MT/month	6.495318556
Oct	2006	WSR Combustion Sources	Stationary Comb	Carbon Dioxide	8694	bbi	5155	mtbu/bbl	FuelUsage*HHV*EF* ConvLkg*ConvMmbtuMbu	6713034 126	lb/month	3044 98468	MT/month	3044 98468
Oct	2006	WSR Combustion Sources	Stationary Comb	Methane	8694	bbi	5155	mtbu/bbl	FuelUsage*HHV*EF* ConvLkg*ConvMmbtuMbu	286 076 189	lb/month	0.13429808	MT/month	3.3574515
Oct	2006	WSR Combustion Sources	Stationary Comb	Nitrogen Oxide	8694	bbi	5155	mtbu/bbl	FuelUsage*HHV*EF* ConvLkg*ConvMmbtuMbu	59 21523781	lb/month	0.026859612	MT/month	8.004164376
Nov	2006	WSR Combustion Sources	Stationary Comb	Carbon Dioxide	7108	bbi	5155	mtbu/bbl	FuelUsage*HHV*EF* ConvLkg*ConvMmbtuMbu	5484731 295	lb/month	2492.371155	MT/month	2492.371155
Nov	2006	WSR Combustion Sources	Stationary Comb	Methane	7108	bbi	5155	mtbu/bbl	FuelUsage*HHV*EF* ConvLkg*ConvMmbtuMbu	242 3433385	lb/month	0.10992522	MT/month	2.7481305
Nov	2006	WSR Combustion Sources	Stationary Comb	Nitrogen Oxide	7108	bbi	5155	mtbu/bbl	FuelUsage*HHV*EF* ConvLkg*ConvMmbtuMbu	48 4686677	lb/month	0.021985044	MT/month	6.551543112
Dec	2006	WSR Combustion Sources	Stationary Comb	Carbon Dioxide	8814	bbi	5155	mtbu/bbl	FuelUsage*HHV*EF* ConvLkg*ConvMmbtuMbu	6813528 649	lb/month	3090 568283	MT/month	3090 568283
Dec	2006	WSR Combustion Sources	Stationary Comb	Methane	8814	bbi	5155	mtbu/bbl	FuelUsage*HHV*EF* ConvLkg*ConvMmbtuMbu	300 5084673	lb/month	0.13630851	MT/month	3.40771275
Dec	2006	WSR Combustion Sources	Stationary Comb	Nitrogen Oxide	8814	bbi	5155	mtbu/bbl	FuelUsage*HHV*EF* ConvLkg*ConvMmbtuMbu	60 10 69346	lb/month	0.027261702	MT/month	8.123987196



Appendix B

August 31, 2018 IES Response to DOH Email dated July 24, 2018

From: [Chung, Anna S.](#)
To: "McFall, Keith"
Cc: [Madsen, Michael A](#); [Peak, Mark](#)
Subject: RE: [*EXTERNAL*] Status question: Monday email: IES GHG Reduction Plan Discussion
Date: Friday, August 31, 2018 4:42:00 PM
Attachments: [image002.png](#)
[IES Response to DOH July 24 Email Request.docx](#)
[Item 1 2016 Refinery eGGRT GHG Calc Workbook.xlsx](#)
[Item 1 2017 Refinery eGGRT GHG Calc Summary.xlsx](#)
[Item 2 2010 FCC CO2 Calculation Differences.xlsx](#)
[Item 3 2009 FO FG WSR Calculation Difference.xlsx](#)

Hi Keith,

Please find attached our response to your emailed request on July 24, 2018 and supporting documentation. Let me know if you have any questions.

Thank you,



Anna S. P. T. Chung
Environmental Engineer
achung@islandenergyservices.com

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From: McFall, Keith [mailto:Keith.McFall@doh.hawaii.gov]
Sent: Tuesday, August 28, 2018 1:51 PM
To: Chung, Anna S. <AChung@islandenergyservices.com>
Cc: Madsen, Michael A <michael.madsen@doh.hawaii.gov>; Peak, Mark <MPeak@islandenergyservices.com>
Subject: RE: [*EXTERNAL*] Status question: Monday email: IES GHG Reduction Plan Discussion

IES Response to DOH Email Request on July 24, 2018

Prepared by Anna Chung
August 31, 2018

REQUEST:

While it sounded like the GHGERP outlined the reasons for the emissions differences highlighted in the "IES-chev-ref-ref-SLEIS-2016-16.xlsx" file, we would like to have the detailed calculations to document the reasons.

We think this can be accomplished if we received:

- 1) annual emissions inventory calculations that follow the requirements of EPA's e-GGRT reporting for the 2016 and 2017 emissions years. These calculations would be consistent with the information already provided for the proposed 2006 – 2010 emission years.*
- 2) calculations that document the difference between FCC CO2 emission calculations for 2010 as reported to EPA and provided in the GHGERP supporting spreadsheet; I believe we talked about the ~3.5% difference in the meeting, and I may have forgotten the explanation for the difference, but I think it would be good to document this if the data is available.*
- 3) calculations that compare the results of facility reporting requirements for EPA e-GGRT & CAB annual emissions for annual fuel throughputs, higher heating values (HHVs), and annual heats associated with fuel oil combustion, fuel gas combustion, and WSR combustion for the 2009 baseline year.*
- 4) corrections for any errors in annual emissions reporting to CAB for 2006 – 2017 of fuel oil, fuel gas, or WSR combustion throughputs or HHVs; as I recall from the meeting, the 2010 fuel gas combustion throughputs reported to DOH were in error. These would be errors, not differences caused by conflicting e-GGRT and DOH annual emissions reporting requirements.*

RESPONSE:

- 1) annual emissions inventory calculations that follow the requirements of EPA's e-GGRT reporting for the 2016 and 2017 emissions years. These calculations would be consistent with the information already provided for the proposed 2006 – 2010 emission years.**

The following excel spreadsheets were used for inputting GHG data in eGGRT for RY2016 and RY 2017.

- 2016 Refinery eGGRT GHG Calc Workbook
- 2017 Refinery eGGRT GHG Calc Summary

2016 emission data were collected and calculations completed using formulas in the workbook "2016 Refinery eGGRT GHG Calc Workbook.xlsx". The data was then reentered into EPA's eGGRT website, calculations completed using the online IVT calculator and verified against the workbook calculations prior to submittal.

In 2017, IES worked with Sphera to configure Essential Suite, the GHG software program that Chevron used for calculating RY2015 and RY2016 GHG emissions, to complete the GHG calculations instead of

using the excel workbook. Emission reports were configured by Sphera to replicate the workbook tabs to facilitate data entry into eGGRT. The file "2017 Refinery eGGRT GHG Calc Summary.xlsx" gathers the various reports into one file with a summary sheet listing all the process units and their emissions. Included in the summary are comments comparing the Essential Suite and IVT calculations.

2) *calculations that document the difference between FCC CO2 emission calculations for 2010 as reported to EPA and provided in the GHGERP supporting spreadsheet;*

Three calculation methods documenting the 2010 CO2e emission results obtained by using different averaging periods of the same data are presented in the file "FCC 2010 CO2 Calculation Differences.xls." Method 1 presents the results from the GHGERP supporting spreadsheet, submitted to the DOH in 2016, which calculates the monthly CO2e and sums the emissions to get the annual CO2e emitted. Calculating the FCC's CO2e monthly provides more accurate emissions results because it is more sensitive to operational data fluctuations (the FCC was shut down in December for ~12 days). As a result, calculation method 1 is 3.5% lower than what was reported to the EPA. Recalculating the 2010 FCC data using the GHG Emission Calculation Summary spreadsheet, method 3, which replicates the eGGRT IVT yields a result nearly equivalent to the eGGRT FLIGHT report result. The eGGRT IVT uses an average of the hourly data over the year (8760 data points) to calculate a single average for the annual CO2e. This smooths out the effects of outlier data, resulting in higher emissions. Method 2 shows that averaging the average monthly data, provided in 2016, also results in emissions much lower than IVT calculations. Method 4 recalculates annual emissions using data from the EPA Flight report and shows the difficulty of recalculating the same number as eGGRT.

3) *calculations that compare the results of facility reporting requirements for EPA e-GGRT & CAB annual emissions for annual fuel throughputs, higher heating values (HHVs), and annual heats associated with fuel oil combustion, fuel gas combustion, and WSR combustion for the 2009 baseline year.*

The results of facility reporting requirements for EPA e-GGRT & CAB annual emissions for annual fuel throughputs, higher heating values (HHVs), and annual heats associated with fuel oil combustion, fuel gas combustion, and whole straight run (WSR) combustion for the 2009 baseline year differ from each other for several reasons. In 2009, CAB annual emission calculations were prepared by the refinery's Environmental department to reflect air emissions from permitted refinery equipment. GHG reporting was managed at a corporate level and calculations were completed by the refinery's process engineering department to reflect overall refinery GHG emissions. Two independent groups with different emissions reporting purposes contributed to the differences in data used for calculating air and GHG emissions.

A comparison of annual emissions and GHG reported results are on the attached spreadsheet "FO FG WSR Calculation Difference.xlsx", tab "FO FG WSR Summary." These calculations were compiled by DOH in a spreadsheet titled "IES-chev-ref-SLEIS-2016-15.xlsx" and summarizes the 2006-2010 GHG data submitted by Chevron in 2016 with annual emissions data submitted to CAB.

Fuel Oil Combustion

Fuel oil throughput data for 2009 annual emissions used pi tags that measure low sulfur fuel oil (LSFO) flow to each emission unit identified in the covered source permit (CSP). This meets DOH HAR 11-60.1-111 definition of "verifiable documentation". Fuel oil throughput data for 2009 EPA GHG emissions used tank drop to calculate daily fuel oil use from the LSFO tank that feeds the refinery. This meets the EPA 40 CFR 98.6 definition of "company record". As a result, two valid but, different methods were used for gathering fuel use. The difference in pi data and tank drop can be attributed to a delta between the meter readings and pi, which averages ~65 bpd more (6%). Calculating GHG emissions using fuel oil tank drop is more conservative and reflects a slightly higher fuel consumption resulting in greater CO₂e emissions.

The 2009 fuel oil HHVs used in the both calculations come from lab StarLIMs data however, the averaging period used by each method is different causing a slight 0.06% difference in the number. Annual emissions use the average gross-BTU (higher heating value) of all the lab samples taken throughout the year while GHG emissions uses a weighted average gross-BTU (higher heating value) based on the monthly average HHV and fuel usage.

Fuel Gas Combustion

Fuel gas throughput data for 2009 annual emissions used the pi tags that measure fuel gas for each process unit identified in the CSP. 2009 EPA GHG emission calculations used the pi tag for the fuel gas mix drum which is upstream of the process units. This tag captures additional fuel gas use that was not used for combustion in an air-permitted combustion unit, for example, use of fuel gas for insignificant activities like furnace pilot flames. Thus, the GHG calculation has a 22.86% higher throughput.

The 2009 annual emission HHVs use the average HHV of all the lab StarLIMs samples taken throughout the year whereas, the GHG HHVs uses the default Natural Gas HHV per 40 CFR 98 Table C-1. This results in a 0.78% lower HHV used for GHG emissions.

WSR Combustion

Like fuel oil, 2009 WSR throughput data for annual emissions used pi tags that measure WSR flow to each emission unit identified in the CSP. WSR throughput data for 2009 EPA GHG emissions used tank drop to calculate daily WSR use from the WSR tank that feeds the refinery. The difference in pi data and tank drop can be attributed to a delta between the meter readings and pi, which averages ~4.5 bpd more (~1%).

The 2009 WSR HHVs used in the both calculations come from the lab StarLIMs data however, the annual emissions use the net-BTU (Lower Heating Value) and the EPA GHG emissions calculations use the gross-BTU (Higher Heating Value). Net-BTU is ~11 MMscfs lower than the gross-BTU. In addition to this, the averaging period used for the annual HHV is different. Annual emissions use the average HHV of all the lab samples taken throughout the year while GHG emissions uses a weighted average HHV based on the monthly average HHV and fuel usage. This results in a 6.7% higher HHV used for GHG emissions. Starting from RY2015, the annual emissions calculations use the gross-BTU value so, there should be no significant differences in the HHVs.

- 4) corrections for any errors in annual emissions reporting to CAB for 2006 – 2017 of fuel oil, fuel gas, or WSR combustion throughputs or HHVs; as I recall from the meeting, the 2010 fuel gas combustion throughputs reported to DOH were in error. These would be errors, not differences caused by conflicting e-GGRT and DOH annual emissions reporting requirements.**

IES has not conducted a separate audit to validate the numbers that were submitted from 2006 through 2015 by the former owner, Chevron, however, upon review of past submittals from 2006 -2017, we can confirm that the reported fuel gas throughput in 2010 is overstated by a magnitude of 110% due to a unit conversion error for the crude furnace throughput. The crude furnace throughput was overstated by a factor of 1000 compared to 2009 throughput, as shown in Figure 2 below. No other errors for fuel oil, fuel gas, WSR throughput or HHV are suspected.

Figure 1. 2010 Fuel Gas Throughput

Emission Unit ID	Emission Unit Description (78 characters max.)	Fuel Type	Annual Process Thruput	CORRECTED-Annual Throughput	Process Thruput Units
F5103	01 crude furnace	RFG	1119.34	1.11934	E6FT3S
F5153	02 crude furnace	RFG	461.77	0.46177	E6FT3S
F5201	01 boiler	RFG	151.11	151.11	E6FT3S
F5202	02 boiler	RFG	171.58	171.58	E6FT3S
F5203	03 boiler	RFG	107.1	107.1	E6FT3S
F5300	FCC Furnace	RFG	58.404	58.404	E6FT3S
F5600	Hydrogenation	RFG	11.272	11.272	E6FT3S
F5700	H2 Manufac.	RFG	94.237	94.237	E6FT3S
F5930	Isom Furnace 01	RFG	51.158	51.158	E6FT3S
F5950	Isom Furnace 02	RFG	12.614	12.614	E6FT3S
F6003	Asphalt Furnace	RFG	0	0	E6FT3S
F6200	Acid Plant CC	RFG	43.322	43.322	E6FT3S
F6262	Acid Pt Furnace	RFG	40.455	40.455	E6FT3S
KC6701	01 cogen, combined cycle	RFG	146.92	146.92	E6FT3S
KS6701	01 cogen, simple cycle	RFG	20.03	20.03	E6FT3S
KC6702	02 cogen, combined cycle	RFG	220.6	220.6	E6FT3S
KS6702	02 cogen, simple cycle	RFG	35.91	35.91	E6FT3S
KC6703	03 cogen, combined cycle	RFG	273.76	273.76	E6FT3S
KS6703	03 cogen, simple cycle	RFG	0	0	E6FT3S
			3019.6	1440	

Figure 2. 2009 Fuel Gas Throughput

Emission Unit ID	Process ID No. (Fuel ID No.)	Emission Unit Description (78 characters max.)	Fuel Type	Fuel Material Code	Annual Process Thruput	Daily Process Thruput	Process Thruput Units
F5103	2	01 crude furnace	RFG	553	1.072	0.00	E6FT3S
F5153	2	02 crude furnace	RFG	553	0.442	0.00	E6FT3S
F5201	2	01 boiler	RFG	553	151.111	0.41	E6FT3S
F5202	2	02 boiler	RFG	553	134.985	0.37	E6FT3S
F5203	2	03 boiler	RFG	553	142.757	0.39	E6FT3S
F5300	2	FCC Furnace	RFG	553	57.816	0.16	E6FT3S
F5600	2	Hydrogenation	RFG	553	17.832	0.05	E6FT3S
F5700	2	H2 Manufac.	RFG	553	94.595	0.26	E6FT3S
F5930	2	Isom Furnace 01	RFG	553	35.434	0.10	E6FT3S
F5950	2	Isom Furnace 02	RFG	553	14.194	0.04	E6FT3S
F6003	2	Asphalt Furnace	RFG	553	0.000	0.00	E6FT3S
F6200	2	Acid Plant CC	RFG	553	40.847	0.11	E6FT3S
F6262	2	Acid Pt Furnace	RFG	553	41.863	0.11	E6FT3S
KC6701	2	01 cogen, combined cycle	RFG	553	230	0.63	E6FT3S
KS6701	2	01 cogen, simple cycle	RFG	553	0	0.00	E6FT3S
KC6702	2	02 cogen, combined cycle	RFG	553	230	0.63	E6FT3S
KS6702	2	02 cogen, simple cycle	RFG	553	0	0.00	E6FT3S
KC6703	2	03 cogen, combined cycle	RFG	553	212	0.58	E6FT3S
KS6703	2	03 cogen, simple cycle	RFG	553	18	0.05	E6FT3S
					1424		

Last Updated: 9/14/2016 by Diana Kelterborn

General Information:

- This workbook was built to calculate Greenhouse Gas (GHG) emissions for Hawaii Refinery and to list and organize all of the data elements required for EPA reporting under the US EPA's Greenhouse Gas Reporting Program (GHGRP). The rule can be found here: http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=3264ac2218a9c45a4794c4b868e1e75&n=pt40.21.98&r=PART&ty=HTML#e40.23.98_136
- The orange tabs summarize the data for each Subpart and the blue tabs are calculation spreadsheets.
- The blue tabs are modified versions of the 'Optional Calculation Spreadsheets' provided by the EPA. Instructions and original copies of the EPA's 'Optional Calculation Spreadsheets' can be found here: <https://www.ccdsupport.com/confluence/display/help/Optional+Calculation+Spreadsheet+Instructions>
- As noted on each tab, the calculation spreadsheets are locked to avoid inadvertent changes. If modifications need to be made, they can be unlocked using the password "GHG".
- All emissions calculations are done using these EPA spreadsheets except for Subpart MM emissions because no EPA spreadsheet was available for Subpart MM.
- Subpart C and Subpart MM use emission factors from Tables C-1, C-2, MM-1, and MM-2. For reference these are included in dark blue tabs at the end of this workbook.

Instructions:

- Enter activity data into light green boxes on the blue tabs. Type in the data or paste values. The emissions results should automatically appear once all activity data has been pasted.
- Enter non-emissions data into data tables on the orange tabs.

- Enter data into EPA's Electronic Greenhouse Gas Tool (e-GGRT). All data for both the Webform sections and the Inputs Verifier Tool (IVT) sections will be found in this workbook.

Data Entry Notes:

- The calculation spreadsheets assume all gas volumes are measured using 60F as standard temperature, so the spreadsheets use a Molar Conversion Volume of 836.6 scf/kg-mole in emissions calculations. However, the EPA requires that for Subpart P calculations are done using gas volume measured using 68F as standard temperature. The calculation spreadsheet converts the gas volume from 60F to 68F and uses a Molar Conversion Volume of 849.5 scf/kg-mole in emissions calculations. Therefore you should enter all gas volumes using 60F as standard temperature.
- If data is collected more frequently than the calculation spreadsheet requires, average data arithmetically (straight average). For example, daily HHVs should be averaged to a single monthly value using the following formula.

$$A = \frac{1}{n} \sum_{i=1}^n x_i$$

GHG Reporting Year Summary: 2016

Subpart	Process Unit	CO2 Equation	CH4 Equation	N2O Equation	Tier	CO2 Emissions (tonnes)	CH4 Emissions (tonnes)	N2O emissions (tonnes)	2016 Total CO2e Emissions	2015 Total CO2e Emissions
C	GP - 4 Diesel Engines	C-2a and C2b	C-9a	C-9a	1	31,777.46551	1.28897	0.25779	31,886.513	1,018.577
C	GP - 1 Fuel Oil Combustion Sources	C-2a and C2b	C-9a	C-9a	2	115,303.51461	4.60600	0.92120	115,693.182	155,004.802
C	GP - 3 WSR Combustion Sources	C-2a and C2b	C-9a	C-9a	2	57,140.22510	2.52015	0.50403	57,353.430	52,761.570
C	GP - 2 Mix Drum Fuel Gas	C-3	C-8	C-8	3	107,796.31020	1.67386	0.16739	107,888.037	122,710.386
P	Unit 57 - Hydrogen Manufacturing	P-1	N/A	N/A		5,433.02432			5,433.024	5,838.766
Y	Sweet Flare	Y-3	Y-4	Y-5		23.93552	0.07225	0.00024	25.813	0.000
Y	Sour Flare	Y-3	Y-4	Y-5		437.55485	1.32074	0.00438	471.877	35.244
Y	FCC Unit - Plant 53	Y-6 and Y-7a	Y-9	Y-10		184,685.97483	5.41019	1.08204	185,143.677	182,740.232
Y	Unit 62 - Acid Plant	Y-12	N/A	N/A		588.77907			588.779	641.270
Y	Equipment Leaks	N/A	Y-21	N/A			14.50000		362.500	362.500
Y	Storage Tanks	N/A	Y-22	N/A			1.64523		41.131	36.535
TOTAL CO2e:									504,887.964	521,149.883

Subpart A - Facility Information

Plant Code	Hawaii Refinery
Primary NAICS Code	None
Did you use BMM?	324110
Do you have a cogen unit?	No
Total CO2e Emissions	504,887.96

Item 1. 2017 Refinery eGGRT GHG Calc Summary

Last Updated: 3/21/17 Anna Chung

General Information:

- This workbook is used to summarize the GHG emissions calculations from reports created in Essential Suite
- All emissions calculations are done in Essential Suite.
- Subpart C and Subpart MM use emission factors from Tables C-1, C-2, MM-1, and MM-2. For reference these are included in dark blue tabs at the end of this workbook. These factors are built into the Essential Suite calculations.

Instructions:

- Copy/paste value the prior year emissions into a new column for comparison with current reporting year emissions.
- Copy/paste the Essential Suite Reports into this spreadsheet and verify links are working properly.
- Enter data into EPA's Electronic Greenhouse Gas Tool (e-GGRT). All data for both the Webform sections and the Inputs Verifier Tool (IVT) sections will be found in this workbook.

Data Entry Notes:

- The EPA calculation spreadsheets (and Essential Suite) assume all gas volumes are measured using 60F as standard temperature, so the spreadsheets use a Molar Conversion Volume of 836.6 scf/kg-mole in emissions calculations. However, the EPA requires that for Subpart P calculations are done using gas volume measured using 68F as standard temperature. The calculation spreadsheet (and Essential Suite report) converts the gas volume from 60F to 68F and uses a Molar Conversion Volume of 849.5 scf/kg-mole in emissions calculations. **Therefore you should enter all gas volumes using 60F as standard temperature in the calculation spreadsheet/Essential Suite but, enter the eGGRT IVT gas volumes using the 68F column.**
- If data is collected more frequently than the calculation spreadsheet requires, average data arithmetically (straight average). For example, daily HHVs should be averaged to a single monthly value using the following formula.

GHG Reporting Year Summary: 2017

Subpart	Process Unit	CO2 Equation	CH4 Equation	N2O Equation	Tier	CO2 Emissions (tonnes)	CH4 Emissions (tonnes)	N2O emissions (tonnes)	2017 Total CO2e Emissions	2016 Total CO2e Emissions
C	GP - 4 Diesel Engines	C-2a and C2b	C-9a	C-9a	1	37,498.197	1,521.0	0.3042	37,626.875	31,886.513
C	GP - 1 Fuel Oil Combustion Sources	C-2a and C2b	C-9a	C-9a	2	95,728.568	3,824.0	0.7648	96,052.082	115,693.182
C	GP - 3 WSR Combustion Sources	C-2a and C2b	C-9a	C-9a	2	54,023.549	2,382.7	0.4765	54,225.124	57,353.430
C	GP - 2 Mix Drum Fuel Gas	C-3	C-8	C-8	3	120,172.440	1,527.8	0.1528	120,256.163	107,888.037
C	Catalytic Oxidizer	C-3	C-8	C-8	3	105.815	0.0042	0.0004	106.044	5,433.024
P	Unit 57 - Hydrogen Manufacturing	P-1	N/A	N/A		4,881.102			4,881.102	
Y	Sour Flare	Y-3	Y-4	Y-5		0.0000	0.0000	0.0000	0.0000	25.813
Y	Sour Flare	Y-3	Y-4	Y-5		130.335	0.3934	0.0013	140.558	471.877
Y	FCC Unit - Plant 53	Y-6 and Y-7a	Y-9	Y-10		161,852.057	4,741.3	0.9483	162,253.170	185,143.677
Y	Unit 62 - Acid Plant	Y-12	N/A	N/A		581.045			581.045	588.779
Y	Equipment Leaks	N/A	Y-21	N/A			14.5000		362.500	362.500
Y	Storage Tanks	N/A	Y-22	N/A			1.5506		38.765	41.131
TOTAL CO2e:									476,523.430	504,887.964
eGGRT IVT CO2e:									476,522.800	

Subpart A - Facility Information

Plant Code	Hawaii Refinery
Primary NAICS Code	None
Did you use BAMM?	324110
Do you have a cogen unit?	No
Total CO2e Emissions	No
	476,523.43

Item 2. FCC CO2 Calculation Differences

Method	Data Source	2010										Data Input Methodology					
		Flow Rate (Gas Volume) [FlowRateAir]	Flow Rate (O2 Enriched) [FlowRO2Enrich]	Concentration, Enriched (ppmv) - Oxygen [MoPctO2Enrich]	Concentration (ppmv) - Carbon Dioxide [MoPctCO2]	Concentration (ppmv) - Carbon Monoxide [MoPctCO]	Concentration (ppmv) - Oxygen [MoPctO2]	Annual Tons CO2e	Annual Tons CH4e	Annual Tons NO2e	Annual Tons CO2e		DIFFERENCE				
1	Submitted 2016 Data											177,398.82	129.92	309.72	177,838.46		Calculated monthly emissions using the average monthly data. Sum monthly emissions to get annual emissions.
2	Average of 2016 Submitted Data											179,613.04	131.54	313.59	180,058.17		Calculated annual emission using average of the average monthly data.
3	GHG Calculation Spreadsheet											183,848.07	134.64	320.98	184,303.70		Calculated using the GHG Spreadsheet used for 2016 & 2017 emissions using annual average of hourly data
4	eGGRT GHG Report Summary											183,876.52	134.66	321.03	184,332.21		Used data as summarized on GHG Summary Report to recalculate annual emissions.
5	eGGRT Flight Report											183,841.50	134.75	320.95	184,297.20		From eGGRT FLIGHT Report

Item 3. FO FG WSR Calculation Difference

2009 FO FG WSR Summary

		Throughput Unit	2009 Throughput	HHV	HHV Unit Num	HHV Unit Denom	Conversion factor to Throughput Unit	Throughput in HHV Unit Denom	Heat (MMBTU)
Fuel Oil	AEI	BBL	381,694.0	150.262	E68TU	E3GAL	0.0420	16,031.1	2,408,872
	GHG	BBL	406,304.0	150.359	E68TU	E3GAL	0.0420	17,064.8	2,565,841
			6.06%	0.06%				6.06%	6.12%
Refinery Fuel Gas	AEI	E6FT3S	1,423.8	1.036	E68TU	E3FT3S	1,000.00	1,423,848.0	1,475,107
	GHG	E6FT3S	1,845.8	1.028	E68TU	E3FT3S	1,000.00	1,845,824.9	1,897,508
			22.86%	-0.78%				22.86%	22.26%
Whole Straight Run	AEI	BBL	129,991.0	111.143	E68TU	E3GAL	0.0420	5,459.6	606,799
	GHG	BBL	131,668.0	119.150	E68TU	E3GAL	0.0420	5,530.1	658,905
			1.27%	6.72%				1.27%	7.91%

Appendix C
CAB Letter dated July 22, 2019



STATE OF HAWAII
DEPARTMENT OF HEALTH
P.O. Box 3378
HONOLULU, HAWAII 96801-3378

In reply please refer to
File:

19-445E CAB
File No. 0863

July 22, 2019

Mr. Jon Mauer
President & CEO
IES Downstream, LLC
91-480 Malakole Street
Kapolei, Hawaii 96707

Dear Mr. Mauer:

**SUBJECT: Greenhouse Gas (GHG) Emission Reduction Plan
Covered Source Permit (CSP) No. 0863-01-C
IES Downstream, LLC
Kapolei Refinery
Located At: 91-480 Makakole Street, Kapolei, Oahu**

The Department of Health, Clean Air Branch (CAB), has reviewed the IES Downstream, LLC (IES) Greenhouse Gas Emission Reduction Plan (GHGERP) dated December 14, 2018. The plan well documents and accurately projects the planned division of equipment ownership at the Kapolei Refinery. The plan also provides sufficient justification that calendar year 2010 is unrepresentative of normal operations for the baseline year, calendar year 2009 is a more suitable baseline year, and that the calendar year 2009 actual GHG emissions are the most recent representative emissions of normal operations.

The CAB identified minor concerns with respect to the documentation of GHG emissions estimates for calendar years 2006 – 2010 in Sections 2.1 and 2.2 of the GHGERP. The facility-wide emission estimates included in several of the tables did not match those calculated in Attachment V from Appendix B of the GHGERP. For example, in Table 1 of the GHGERP, the proposed 2009 baseline is 581,734 metric tons of CO₂e while Attachment V presents a calculated value of 577,945 metric tons of CO₂e. Based on the information currently available, the CAB has concluded that 577,945 metric tons of CO₂e is the most accurate estimate for 2009 GHG emissions. While Attachment V also notes that the associated approximate 1% difference is due to the "Difference in Averaging Periods, GWP and EF Changes", the CAB cannot concur with the larger 581,734 metric tons of CO₂e value without additional justification.

The CAB also had questions related to calculations in Section 2.3 of the GHGERP that determine the baseline emission split between equipment that IES owns and the equipment that IES sold. The two spreadsheet files that Gail Godenzi of IES sent in a March 13, 2019 email and a follow-up email on March 25, 2019, provided the information needed to document the split in emissions. However, the CAB cannot concur with the proposed CO₂e baseline emission level of 347,277 metric tons for the IES Terminal as it is associated with a total combined CO₂e emissions level of 581,734 metric tons. As stated above, IES should provide additional information to justify use of the 581,734 metric ton value or alternatively propose a revised baseline emission split using the 2009 total combined baseline CO₂e emissions level of 577,945 metric tons from Attachment V in Appendix B of the GHGERP.

Mr. Jon Mauer
July 22, 2019
Page 2

Section 3.0 of the GHGERP proposes a facility-wide GHG emissions cap for the IES Terminal of 291,713 metric tons per year. This value results from the application of a 16% reduction from the proposed IES Terminal CO₂e baseline emissions level of 347,277 metric tons. The CAB cannot concur with the proposed facility-wide GHG emissions cap without the larger 581,734 metric tons of CO₂e combined total being adequately justified. Alternatively, IES could also propose a revised facility-wide GHG emissions cap for the IES Terminal based on the 2009 total combined baseline CO₂e emissions level of 577,945 metric tons from Attachment V in Appendix B of the GHGERP.

Sections 4.0 and 5.0 of the GHGERP presents a GHG Control Assessment, and Proposed Control Strategy, respectively, that are based on a facility-wide GHG emissions cap that is 16% less than the proposed IES Terminal baseline. The CAB cannot currently concur with the contents of these sections because of issues raised with respect to Sections 2.0 and 3.0 of the GHGERP. However, if the CAB had been able to concur with the facility-wide GHG emissions cap for the IES Terminal that represented a 16% reduction from an approved IES Terminal baseline, the contents of these sections would have met the requirements of the HAR.

Please note that CAB appreciates the consistent use of metric tons for quantifying emissions throughout the IES documentation. However, in future updates, please also include the corresponding values in short tons for the IES Terminal proposed baseline emission rate and facility-wide GHG emissions cap.

Based on the results of this review, it appears that relatively minor revisions to technical content in the GHGERP are needed. However, because of the business transactions that have occurred since submitting the GHGERP, a comprehensive revision to the GHGERP could require a significant amount of effort for marginal, if any, addition in clarity. Another option would be for IES to resubmit the GHGERP with an errata document, and the updated information. This would include the contents of the two spreadsheet files provided on March 13, 2019 and clarification in the March 25, 2019 email.

In accordance with HAR §11-60.1-204(e), the CAB requests that a revised GHG Emission Reduction Plan or errata document be provided by August 23, 2019.

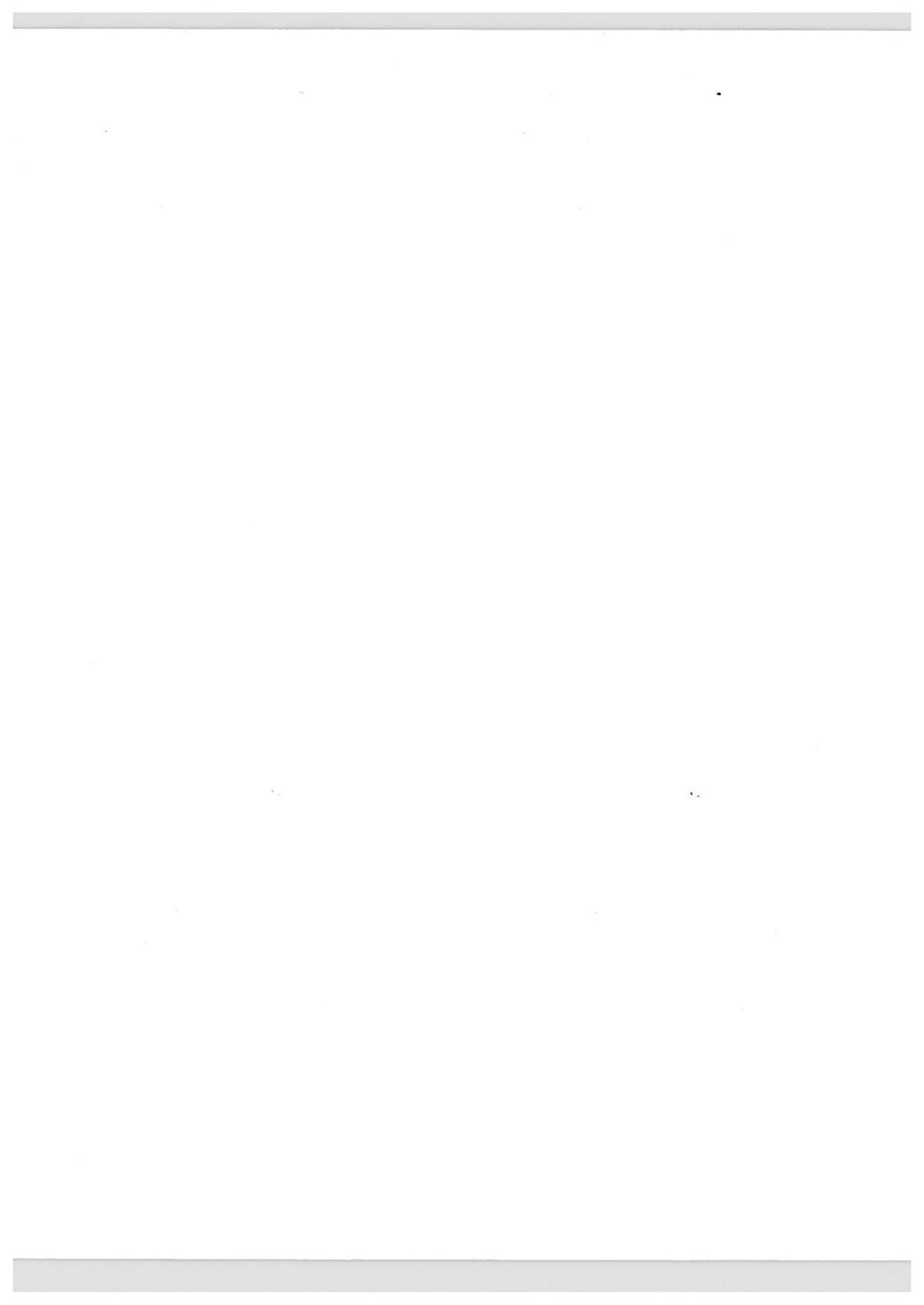
If there are any questions regarding this matter, please contact Mr. Keith McFall of my staff at (808) 586-4200.

Sincerely,



MARIANNE ROSSIO, P.E.
Manager, Clean Air Branch

KM:rkb



DAVID Y. IGE
GOVERNOR OF HAWAII



STATE OF HAWAII
DEPARTMENT OF HEALTH
P.O. Box 3378
HONOLULU, HAWAII 96801-3378

July 22, 2019

FILE COPY

BRUCE S. ANDERSON, Ph.D.
DIRECTOR OF HEALTH

Initials KH mm 7-22-2019
Mailed Out JUL 22 2019

In reply please refer to:
File:

19-445E CAB
File No. 0863

Mr. Jon Mauer
President & CEO
IES Downstream, LLC
91-480 Malakole Street
Kapolei, Hawaii 96707

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Mr. Jon Mauer
July 22, 2019
Page 2

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In accordance with HAR §11-60.1-204(e), the CAB requests that a revised GHG Emission Reduction Plan or errata document be provided by **August 23, 2019**.

If there are any questions regarding this matter, please contact Mr. Keith McFall of my staff at (808) 586-4200.

Sincerely,

MARIANNE ROSSIO, P.E.
Manager, Clean Air Branch

KM:rkb

Mr. Jon Mauer
July 22, 2019
Page 2

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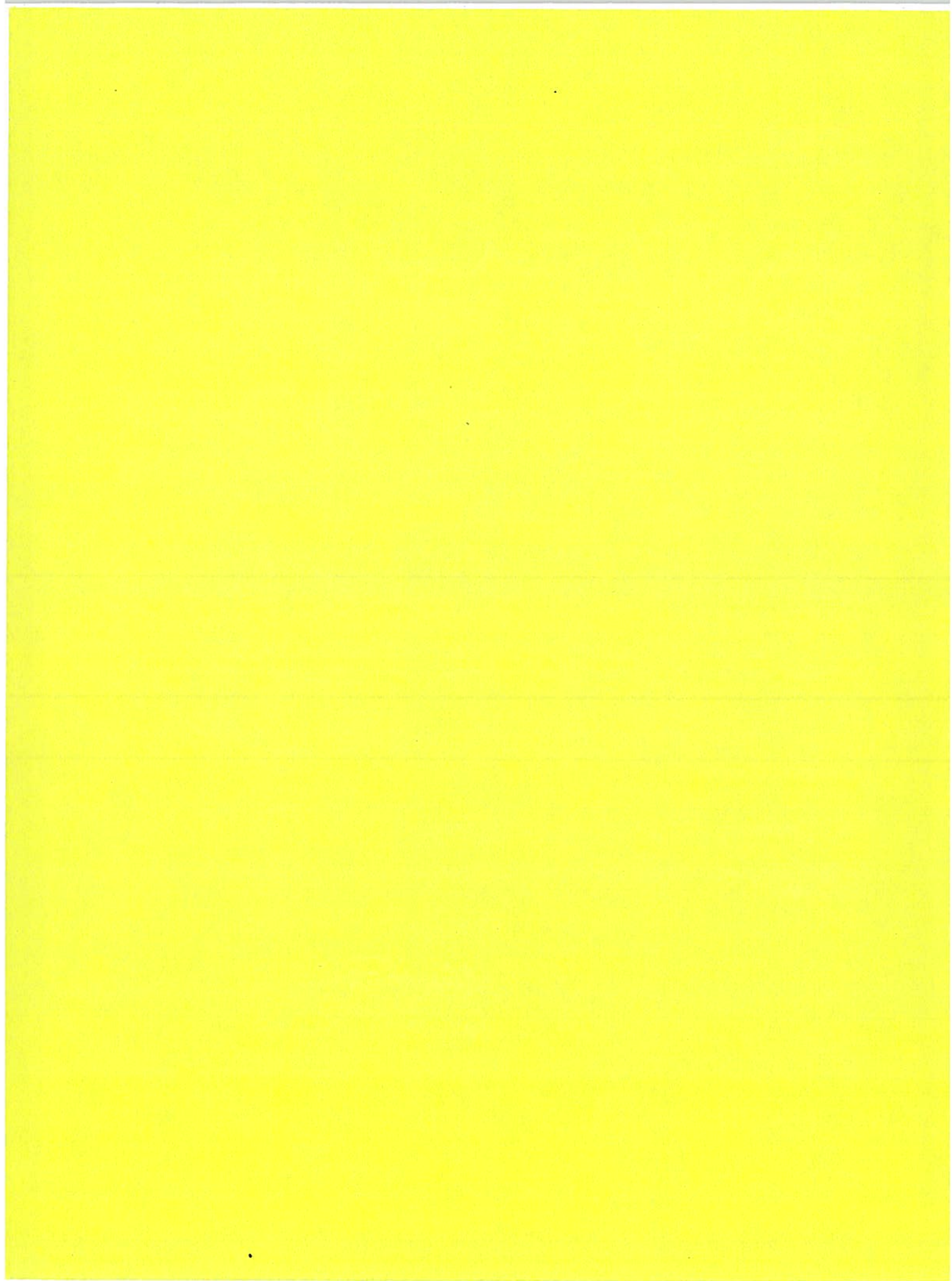
If there are any questions regarding this matter, please contact Mr. Keith McFall of my staff at (808) 586-4200.

Sincerely,



MARIANNE ROSSIO, P.E.
Manager, Clean Air Branch

KM:rkb



**GHG EMISSION REDUCTION PLAN REV 2
IES DOWNSTREAM, LLC
JANUARY 2021**



Appendix D

IES Email response sent March 25, 2019

From: [McFall, Keith](#)
To: [Godenzi, Gail](#)
Subject: RE: [*EXTERNAL*] follow-up to 2/7/2019 meeting-: Emailing - GHG Partnering Request.pdf
Date: Monday, March 25, 2019 4:01:10 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)

Hi Gail,

This answers the question very well.

Thank you,

Keith

Keith McFall, PE, PhD
Environmental Engineer, Clean Air Branch
Environmental Management Division
Tel: (808) 586-4200

From: Godenzi, Gail <Gail.Godenzi@islandenergyservices.com>
Sent: Monday, March 25, 2019 3:40 PM
To: McFall, Keith <Keith.McFall@doh.hawaii.gov>
Subject: RE: [*EXTERNAL*] follow-up to 2/7/2019 meeting-: Emailing - GHG Partnering Request.pdf

FCC Startup heater was never used in the 2009 baseline year

From: McFall, Keith <Keith.McFall@doh.hawaii.gov>
Sent: Tuesday, March 19, 2019 2:29 PM
To: Godenzi, Gail <Gail.Godenzi@islandenergyservices.com>
Cc: Lum, Darin W C <darin.lum@doh.hawaii.gov>; Madsen, Michael A <michael.madsen@doh.hawaii.gov>
Subject: RE: [*EXTERNAL*] follow-up to 2/7/2019 meeting-: Emailing - GHG Partnering Request.pdf

Hi Gail,

Thank you again for the information. It provides the information needed to document the emission split between the two owners.

I only have one minor follow-up, and you probably mentioned this in our conversations. It seems likely that these are presumed insignificant for the purposes of the split, but I would like clarification on emissions associated with the "FCC Startup Air Heater". They do not appear to be included in the "Fuel Gas to Refinery 2009 HDOH Request" file.

Thank you,

Keith

Keith McFall, PE, PhD
Environmental Engineer, Clean Air Branch
Environmental Management Division
Tel: (808) 586-4200

From: McFall, Keith
Sent: Wednesday, March 13, 2019 11:14 AM
To: 'Godenzi, Gail' <Gail.Godenzi@islandenergyservices.com>
Cc: Lum, Darin W C <darin.lum@doh.hawaii.gov>; Madsen, Michael A <michael.madsen@doh.hawaii.gov>
Subject: RE: [*EXTERNAL*] follow-up to 2/7/2019 meeting-: Emailing - GHG Partnering Request.pdf

Hi Gail,

Thank you. I will review and get back to you ASAP.

Keith

Keith McFall, PE, PhD
Environmental Engineer, Clean Air Branch
Environmental Management Division
Tel: (808) 586-4200

From: Godenzi, Gail <Gail.Godenzi@islandenergyservices.com>
Sent: Wednesday, March 13, 2019 10:33 AM
To: McFall, Keith <Keith.McFall@doh.hawaii.gov>; Madsen, Michael A <michael.madsen@doh.hawaii.gov>
Cc: Lum, Darin W C <darin.lum@doh.hawaii.gov>
Subject: RE: [*EXTERNAL*] follow-up to 2/7/2019 meeting-: Emailing - GHG Partnering Request.pdf

Keith, see attached spreadsheets for the calculations of the below requested emissions. Emission factors are included.

Let me know when you have some time and we can walk thru these calculations over the phone, or I can come to you and we can do it FTF.

LMK

Gail



Gail Godenzi
Environmental and Process Engineer
gail.godenzi@islandenergyservices.com

IES Downstream, LLC
91-480 Malakole Street
Kapolei, HI 96707
Tel +1 808. 682.3113
Mobile +1 808.352.7840

Official Licensee of the Texaco Brand in Hawai'i



From: McFall, Keith <Keith.McFall@doh.hawaii.gov>
Sent: Tuesday, March 12, 2019 1:51 PM
To: Godenzi, Gail <Gail.Godenzi@islandenergyservices.com>; Madsen, Michael A <michael.madsen@doh.hawaii.gov>
Cc: Lum, Darin W C <darin.lum@doh.hawaii.gov>
Subject: [*EXTERNAL*] follow-up to 2/7/2019 meeting-: Emailing - GHG Partnering Request.pdf

Hi Gail,

Thank you for the update and letter for reference.

As we discussed in our last telcon, a partnership with a 16% reduction from the combined baseline would remove the need for the information we requested on 2/7/2019 (attached). However, as I recall from our conversations and your 2/28/2019 email (also attached), there should not be a lot of effort needed on your part to respond to that request. I agreed that the emissions by individual unit by process were not needed, but that emissions from groups of units by process for each owner would be needed. So, in the four examples below (taken from the "2009 Baseline Info" sheet, we are requesting the calculation details associated with the

- A. 103,699 CO₂e Metric Ton combined emissions associated with units F-5103 & F-5153 from Fuel Oil Combustions
- B. 89,647 CO₂e Metric Ton combined emissions associated with units F-5201, F-5202, & F-5203 from Fuel Oil Combustion
- C. 76,598 CO₂e Metric Ton combined emissions associated with units F-5103 through F-6704 from Fuel Gas Combustion
- D. 27,391 CO₂e Metric Ton combined emissions associated with units F-5300 through F-5203 from Fuel Gas Combustion.

Sub-part	Emission Group for "IES 2009 Summary" & "Summary Data" (e.g., Crude, FCC, FO Comb, FG Comb, Flare P1, Flare P2, Fugitives, H2 Manufac, AP, WSR Comb)	Owner	Equipment	Equipment Desc.	Permit	Process / Fuel Info	CO2e Metric Ton	Supporting Calculation Reference
C	FO Comb	Eagle Ref.	F-5103	Crude Atm Furnace	CSP 0088-01-C	Fuel Oil Combustion	103,699	?
C	FO Comb	Eagle Ref.	F-5153	Crude Vac Furnace	CSP 0088-01-C	Fuel Oil Combustion		?
C	FO Comb	IES Term.	F-5201	Boiler	Retired	Fuel Oil Combustion	89,647	?
C	FO Comb	IES Term.	F-5202	Boiler	Retired	Fuel Oil Combustion		?
C	FO Comb	IES Term.	F-5203	Boiler	Retired	Fuel Oil Combustion		?
C	FG Comb	Eagle Ref.	F-5103	Crude Atm Furnace	CSP 0088-01-C	Fuel Gas Combustion	76,598	?
C	FG Comb	Eagle Ref.	F-5153	Crude Vac Furnace	CSP 0088-01-C	Fuel Gas Combustion		?
C	FG Comb	Eagle Ref.	F-5700	Hydrogen Furnace	CSP 0088-01-C	Fuel Gas Combustion		?
C	FG Comb	Eagle Ref.	F-5930	Isomerization Furnace	CSP 0088-01-C	Fuel Gas Combustion		?
C	FG Comb	Eagle Ref.	F-5950	Isomerization Furnace	CSP 0088-01-C	Fuel Gas Combustion		?
C	FG Comb	Eagle Ref.	F-5600	Hydrogenation Furnace	CSP 0088-01-C	Fuel Gas Combustion		?
C	FG Comb	Eagle Ref.	F-6200	Acid Plant Combustion Chamber	CSP 0088-01-C	Fuel Gas Combustion		?
C	FG Comb	Eagle Ref.	F-6260	Acid Plant Pre-heater	CSP 0088-01-C	Fuel Gas Combustion		?
C	FG Comb	Eagle Ref.	F-6701	Cogen	CSP 0088-01-C	Fuel Gas Combustion		?
C	FG Comb	Eagle Ref.	F-6702	Cogen	CSP 0088-01-C	Fuel Gas Combustion		?
C	FG Comb	Eagle Ref.	F-6703	Cogen	CSP 0088-01-C	Fuel Gas Combustion		?
C	FG Comb	Eagle Ref.	F-6704	Cogen	CSP 0088-02-C	Fuel Gas Combustion		?
C	FG Comb	IES Term.	F-5300	FCC Furnace	TBD	Fuel Gas Combustion	27,391	?
C	FG Comb	IES Term.	F-5310	FCC Startup Air Heater	TBD	Fuel Gas Combustion		?
C	FG Comb	IES Term.	F-5201	Boiler	Retired	Fuel Gas Combustion		?
C	FG Comb	IES Term.	F-5202	Boiler	Retired	Fuel Gas Combustion		?
C	FG Comb	IES Term.	F-5203	Boiler	Retired	Fuel Gas Combustion		?

Could you propose a delivery date for the information in the spreadsheet "IES-DS-GHGERP-Dec2018-1.xlsx" if indication of a tentative agreement between the two owners cannot be presented by that time?

Thank you,

Keith

Keith McFall, PE, PhD
Environmental Engineer, Clean Air Branch
Environmental Management Division
Tel: (808) 586-4200





GHGERP Change Log

Date	Description of Review/ Amendment
06/2018	Start of Change Log
12/18/18	GHG plan submitted to HDOH with split between IES and Par
8/22/19	Revised 12/18/18 plan to IES only with Lower FCC Combustion based on HDOH request (Rev 1)
1/24/21	Revised 8/22/19 plan - Transferred Boilers 1/2/3 equipment ownership to Par, updated Sections 2,3,4,5, and added Section 6 regarding partnering (Rev 2).